

Shoreline Master Program (KCC 21A.25) Consistency Analysis

Tolt Dam Early Warning System Replacement
City of Carnation and King County, Washington

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Introduction

This analysis is intended to support the application for rehabilitation of existing components and construction of new components of the Seattle Public Utilities (SPU) owned and operated Tolt Dam Early Warning System (TEWS). SPU plans to replace outdated equipment and expand the existing system to enhance the resilience and reliability of the TEWS.

The current system includes several components: detection devices at the dam site, verification cameras, microwave communication links between the site and the remote-control rooms, data network connections to the King County I-Net, outdoor warning sirens downstream along the Tolt River and in Carnation town center, indoor sirens in school and fire station buildings, siren controls in the two SPU control centers, added electronic highway message signs and added street evacuation signs.

The project requires installation of several outdoor warning sirens (OWS), highway message signs (HMS), and static evacuation route signs. No in water work is required for this project and given the small footprint of the sites, anticipated impacts and disturbances are minimal. The following project components are within Shoreline jurisdiction:

- OWS 1 (Conservancy Environment) –(replacement of existing pole)
- OWS 9 (Residential Environment)
- OWS 10 (Conservancy Environment)
- HMS 1 (Resource Environment)
- HMS 2 (Conservancy Environment)
- HMS 3 (Resource Environment)
- HMS 4 (Conservancy and Resource Environments)

Per the Shoreline uses table in 21A.25.100.B, Utility facilities require approval of a shoreline substantial development permit in the Resource, Residential, and Conservancy Environments and approval of a conditional use permit in the Aquatic Environment. The use table also references footnote C26. This footnote states Utility facilities are subject to the standards in KCC 21A.25.260. No components of this project are located within Aquatic shoreline areas.

The following sections provide an analysis of the proposed project's consistence with the requirements of the RCW 90.58 King County Shoreline Master Plan and KCC 21A.25. Additional detail about the project and its compliance with the King County Critical Areas Code (KCC 21A.24) requirements can be found in the project's Critical Areas Assessment (PBS 2022).

21A.25 Shorelines

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>21A.25.040 Shoreline master program goals - required for permits or appeals.</p> <p>The goals, policies, and regulations of the King County shoreline master program must be met before issuing any permits or approvals on land within the shoreline jurisdiction.</p>	<p><i>The goals and policies of the King County shoreline master program are addressed later in this narrative.</i></p>
<p>21A.25.050 Shoreline jurisdiction delineated.</p> <p>A. The requirements of the shoreline master program apply to all uses and development occurring within the shoreline jurisdiction.]* The King County shoreline jurisdiction consists of shorelines, shorelines of statewide significance, and shorelands as defined in RCW 90.58.030 and K.C.C. chapter 21A.06, and the one-hundred-year floodplain.</p> <p>B. The shoreline jurisdiction does not include tribal reservation lands and lands held in trust by the federal government for tribes. Nothing in the King County shoreline master program or action taken under that program shall affect any treaty right to which the United States is a party.</p> <p>C. The lakes and segments of rivers and streams constituting the King County shoreline jurisdiction are set forth in Attachment H to Ordinance 19146**. The King County shoreline jurisdiction is shown on a map adopted in chapter 6 of the King County Comprehensive Plan. If there is a discrepancy between the map and the criteria established in subsection A. of this section, the criteria shall constitute the official King County shoreline jurisdiction. The county shall update the shoreline master program to reflect the new designation within three years of the discovery of the discrepancy.</p>	<p><i>Portions of the project are in shorelines of the state and associated shorelands. The affected shorelines include the Snoqualmie River and the Tolt River. Both rivers are Shorelines of Statewide Significance.</i></p>
<p>21A.25.060 Names of shoreline environments designations.</p>	<p><i>Seven of the proposed elements are within Conservancy, Residential, and Resource environments. One (OWS 1) is a modification to/replacement of an existing pole.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. The shoreline environment designations are included on a map in chapter 6 of the King County Comprehensive Plan. If there is a discrepancy between the map and the criteria established in chapter 6 of the King County Comprehensive Plan for shoreline environment designations, the criteria shall constitute the official King County shoreline environment designation. Any parcel of land included within the shoreline jurisdiction without a shoreline environment designation shall be considered within the Conservancy environment.</p>	<p><i>No discrepancy was identified.</i></p>
<p>C. The purpose of each shoreline environment designation is defined as follows:</p> <ol style="list-style-type: none"> 1. The purpose of the High Intensity shoreline is to provide for high intensity water-oriented commercial and industrial uses 2. The purpose of the Residential shoreline is to accommodate residential and commercial uses on a scale appropriate with urban residential zones 3. The purpose of the Rural shoreline is to accommodate land uses normally associated with rural area levels of development while providing appropriate public access and recreational uses to the maximum extent practicable 4. The purpose of the Conservancy shoreline is to conserve areas that are a high priority for restoration, include valuable historic properties or provide recreational opportunities 5. The purpose of the Resource shoreline is to allow for mining and agricultural uses on lands that are designated under the Growth Management Act as agricultural land of long term commercial significance or mineral resource lands 6. The purpose of the Forestry shoreline is to allow for forestry uses 7. The purpose of the Natural shoreline is to protect those shoreline areas that are relatively free of human influence or have high ecological quality. This designation allows only very low intensity uses in order to maintain the existing high levels of ecological process and function; and 	<p><i>The portions of the project are within the Conservancy, Residential, and Resource environments.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>8. The Aquatic environment is to protect, restore and manage the unique characteristics and resources of the areas waterward of the ordinary high water mark.</p>	
<p>21A.25.070 Boundary determination.</p> <p>A. Where different environment designations have been given to a tributary and the mainstream at the point of confluence, the environment designation given to the mainstream shall extend for a distance of two hundred feet up the tributary.</p> <p>B. In case of uncertainty as to a wetland or environment boundary, the director shall determine its exact location in accordance with RCW 90.58.030 and this chapter.</p>	<p><i>The shoreline environment boundaries were determined based on the map entitled Shorelines of the State, 2020 King County Comprehensive Plan, 2020, Chapter Six, Shorelines and GIS information provided by King County iMap.</i></p>
<p>21A.25.080 Sequence of mitigation measures - priority.</p> <p>A. Mitigation measures shall be applied in the following sequence of steps listed in order of priority, with subsection A.1. of this section being top priority:</p> <ol style="list-style-type: none"> 1. Avoiding the impact altogether by not taking a certain action or parts of an action 2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts 3. Rectifying the impact 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. 	<p><i>Project is expected to result in negligible impacts to shoreline areas. We anticipate no mitigation will be required.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. In determining appropriate mitigation measures applicable to shoreline development, lower priority measures shall be applied only where higher priority measures are determined to be infeasible or inapplicable.</p>	<p><i>Please see response above for (A).</i></p>
<p>C. Mitigation shall be designed to:</p> <ol style="list-style-type: none"> 1. Achieve no net loss of ecological functions for each new development 	<p><i>As shown in the documents, studies, and plans included in the application, the project is designed to achieve no net loss of ecological functions. The project footprint is minimal and proposed actions result in no loss of ecological functions.</i></p>
<ol style="list-style-type: none"> 2. Not require mitigation in excess of that necessary to assure that the development will result in no net loss of shoreline ecological functions; and 	<p><i>The applicant understands the concept.</i></p>
<ol style="list-style-type: none"> 3. Not result in a significant adverse impact on other shoreline ecological functions. 	<p><i>The project is designed to achieve no net loss of ecological function. The project components are located on existing road prism, proposed activities have minimal impacts on ecological functions.</i></p>
<p>D. When compensatory measures are appropriate under the mitigation priority sequence in subsection A. of this section, preferential consideration shall be given to measures that replace the impacted functions directly and in the immediate vicinity of the impact. The department may approve alternative compensatory mitigation within the watershed if the mitigation addresses limiting factors or identified critical needs for shoreline resource conservation based on watershed or comprehensive resource management plans applicable to the area of impact. The department may require appropriate safeguards, terms or conditions as necessary to ensure no net loss of shoreline ecological functions as conditions of approval for compensatory mitigation measures.</p>	<p><i>No compensatory mitigation required.</i></p>
<p>21A.25.090 Shoreline use and modification - defined - no net loss of shoreline ecological functions allowed - sequencing compliance.</p> <p>A. Shoreline use is an activity that is allowed within a specific shoreline environment. Shoreline uses are identified in K.C.C. 21A.25.100.</p>	<p><i>21A.25.100 is addressed elsewhere in this narrative.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. Shoreline modification is construction of a physical element such as a bulkhead, groin, berm, jetty, breakwater, dredging, filling, vegetation removal or alteration or application of chemicals that changes the natural or existing shoreline conditions. Shoreline modifications are identified in K.C.C. 21A.25.160.</p>	<p><i>Shoreline modifications are limited to the minimum needed to accomplish the public safety goals of the project and consist of limited clearing of vegetation, grading, and filling to support pole foundations. Each installation will include a small concrete pad to provide for safe access and act as a stable equipment support. Impacts within the shoreline are limited to developed portions of road right-of-way.</i></p>
<p>C. King County shall ensure that uses and modifications within the shoreline jurisdiction do not cause a net loss of shoreline ecological functions and comply with the sequencing requirements under K.C.C. 21A.25.080.</p>	<p><i>As indicated above, the project is designed to assure no net loss of functions. The proposed activities will modify shoreline areas, but all impacts are designed to be in developed areas associated with existing road prisms and comply with the sequencing requirements.</i></p>
<p>21A.25.100 Shoreline use.</p> <p>A. The shoreline use table in this section determines whether a specific use is allowed within each of the shoreline environments. The shoreline environment is located on the vertical column and the specific use is located on the horizontal row of the table. The specific uses are grouped by the shoreline use categories in WAC 173-26-241. The specific uses are defined by those uses in K.C.C. chapter 21A.08.</p>	<p><i>None required.</i></p>
<p>B. Shoreline uses</p>	<p><i>21A.25.100 is the table of shoreline uses. Per the table, Utility Facilities are allowed by shoreline substantial development permit approval in the Conservancy, Residential, and Resource environments and by shoreline conditional use in the Aquatic environment. Per footnote 26, Utility facilities are subject to the standards in K.C.C. 21A.25.260.</i></p>
<p>21A.25.160 Shoreline modification.</p> <p>A. The shoreline modification table in this section determines whether a specific shoreline modification is allowed within each of the shoreline environments [...]</p>	

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. Shoreline modifications.</p>	<p><i>The following addresses the shoreline modification.</i></p> <p><i>The project will include excavation/filling and removal of existing intact native vegetation.</i></p> <p><u><i>Excavation/Filling</i></u></p> <p><i>At OWS 10, the project will require 1.74 cubic yards of fill in the Conservancy environment.</i></p> <p><i>At OWS 9, the project will require 0.2 cubic yards of fill in the Residential environment.</i></p> <p><i>At HMS 1 and HMS 3, the project will require 1.35 cubic yards of fill (0.28 and 1.07 CY, respectively) in the Resource environment.</i></p> <p><i>At HMS 2, the project will require 1.8 cubic yards of fill in the Conservancy environment.</i></p> <p><i>At HMS 4, the project will require 5.72 cubic yards of fill in the Resource and Conservancy environments.</i></p> <p><u><i>Removal of existing intact native vegetation</i></u></p> <p><i>At OWS 10, the project will require 100 square feet of disturbance in the Conservancy environment.</i></p> <p><i>At OWS 9, the project will require 100 square feet of disturbance in the Residential environment.</i></p> <p><i>At HMS 1 and HMS 3, the project will require 100 square feet of disturbance in the Resource environment.</i></p> <p><i>At HMS 2, the project will require 100 square feet of disturbance in the Conservancy environment.</i></p> <p><i>At HMS 4, the project will require 1,000 square feet of disturbance in the Resource and Conservancy environments.</i></p> <p><i>Clearing is required for site access and ongoing maintenance.</i></p>
<p>C. Development conditions.</p> <p>4. a. Filling must meet the standards in K.C.C. 21A.25.190.</p>	<p><i>Compliance with 21A.25.190 is addressed elsewhere in this narrative.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>b. A shoreline conditional use permit is required to:</p> <ul style="list-style-type: none"> (1) Place fill waterward of the ordinary high water mark for any use except ecological restoration or for the maintenance and repair of flood protection facilities; and (2) Dispose of dredged material within shorelands or wetlands within a channel migration zone. 	<p><i>The project does not propose any in-water work; therefore, fill will not be placed waterward of the ordinary high water mark or in wetlands. Additionally, there is no proposed or anticipated dredging or disposal of dredged material.</i></p>
<p>c. Fill shall not be placed in critical saltwater habitats except when all of the following conditions are met:</p>	<p><i>There are no critical saltwater habitats in the project area.</i></p>
<p>d. In a channel migration zone, any filling shall protect shoreline ecological functions, including channel migration.</p>	<p><i>King County iMap indicates a severe channel migration hazard area within the proposed work area of HMS 2. The channel migration hazard area corresponds with the adjacent Tolt River; however, the proposed work area is located in existing developed road rights-of-way.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>6. Excavation, dredging and filling must meet the standards in K.C.C. 21A.25.190. A shoreline conditional use permit is required to dispose of dredged material within shorelands or wetlands within a channel migration zone.</p>	<p><i>The project involves excavation. No dredging or disposal of dredge materials is proposed. 21A.25.190 is addressed elsewhere in this narrative.</i></p> <p><u>Conservancy Environment</u></p> <p><i>Excavation will be undertaken in the Conservancy Environment for the placement of outdoor warning siren poles and highway message sign infrastructure.</i></p> <p><i>Per the Shoreline Modifications Table, excavation may be permitted by approval of a shoreline substantial development permit provided the project does not include disposal of dredge spoils.</i></p> <p><i>Compliance with 21A.25.190 is addressed elsewhere in this narrative.</i></p> <p><u>Resource Environment</u></p> <p><i>The project involves excavation in the Resource Environment for the placement of outdoor warning siren poles and highway message sign infrastructure. No disposal of dredged materials will occur.</i></p> <p><i>Per the Shoreline Modifications Table, excavation may be permitted by approval of a shoreline substantial development permit provided the project does not include disposal of dredge spoils.</i></p> <p><i>Compliance with 21A.25.190 is addressed elsewhere in this narrative.</i></p> <p><u>Residential Environment</u></p> <p><i>The project involves excavation in the Residential Environment for the placement of outdoor warning siren poles and highway message sign infrastructure. No disposal of dredged materials will occur.</i></p> <p><i>Per the Shoreline Modifications Table, excavation may be permitted by approval of a shoreline substantial development permit provided the project does not include disposal of dredge spoils.</i></p> <p><i>Compliance with 21A.25.190 is addressed elsewhere in this narrative.</i></p> <p><u>Aquatic Environment</u></p> <p><i>There is no proposed work in the Aquatic Environment.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>8. Vegetation Management. Within the critical area and critical area buffer, vegetation removal is subject to K.C.C. chapter 21A.24.</p>	<p><i>Natural vegetation will be retained to the maximum extent possible. Project work areas vary from approximately 100 to 800 square feet in size and are located in the developed road prism footprint. No trees will be removed for the project. Most affected areas are dominated by maintained/mowed vegetation consisting of grasses, weeds, herbaceous perennial vegetation. Work areas will be reseeded with a grass mix appropriate for developed ROW areas.</i></p>
<p>9. Vegetation Management, except for forest practices conducted under K.C.C. 21A.25.130, existing native vegetation located outside of the critical area and critical area buffer shall be retained to the maximum extent practical. Within the critical area and critical area buffer, vegetation removal is subject to K.C.C. chapter 21A.24.</p>	<p><i>Please see response above for (8).</i></p>
<p>21A.25.170 Shoreline stabilization.</p>	<p><i>No shoreline stabilization is proposed.</i></p>
<p>21A.25.190 Excavation, dredging, dredge material disposal and filling. Excavation, dredging, dredge material disposal and filling may be permitted only as follows: A. Fill or excavation landward of the ordinary high water mark shall be subject to K.C.C. chapters 16.82 and 21A.24;</p>	<p><i>16.82 is the clearing and grading standard in Title 16, Building and Construction Standards. 16.82.120 Shorelines states:</i></p> <ul style="list-style-type: none"> <i>A. Any fill placed upon land adjacent to or beneath any stream or water body shall be contained and placed so as to prevent adverse effect upon other lands.</i> <i>B. For grading that requires a shoreline management substantial development permit, the conditions of the shoreline management substantial development permit shall be incorporated into the conditions of any permit issued pursuant to this chapter and shall be subject to the inspection and enforcement procedures authorized by this chapter.</i> <p><i>Project work areas are approximately 100 to 800 square feet in size and are located in the developed road prism. The proposal does not include alteration of or impacts to critical areas other than floodplains/floodways/Channel Migration Hazard/Erosion Hazard areas within developed road rights-of-way.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. Fill may be permitted below the ordinary high water mark only:</p> <p>6. For expansion or alteration of transportation or utility facilities currently located on the shoreline and then only upon demonstration that alternatives to fill are not feasible; or</p> <p>7. As part of mitigation actions, environmental restoration projects and habitat enhancement projects.</p>	<p><i>No fill is proposed below the ordinary high water mark or in wetlands.</i></p>
<p>C. Fill or excavations shall be permitted only when technical information demonstrates water circulation, littoral drift, aquatic life and water quality will not be substantially impaired and that the fill or excavation will not obstruct the flow of the ordinary high water, flood waters or cutoff or isolate hydrolic [sic] features from each other</p>	<p><i>No in-water work is proposed.</i></p>
<p>D. Dredging and dredged material disposal below the ordinary high water mark shall be permitted only</p> <p>2. When necessary to mitigate conditions that endanger public safety or fisheries resources</p>	<p><i>Neither dredging nor dredged material disposal is proposed.</i></p>
<p>21A.25.200 Channel migration zone - new development to avoid future shoreline stabilization.</p> <p>In the channel migration zone in the shoreline jurisdiction, to the maximum extent practical, new development shall be located and designed to avoid the need for future shoreline stabilization.</p>	<p><i>King County iMap indicates a severe channel migration hazard area within the proposed work area of HMS 2. The channel migration hazard area corresponds with the adjacent Tolt River; however, the proposed work area is located on existing developed road prism and is not expected to have impacts beyond the existing road prism.</i></p>
<p>21A.25.220 Shoreline dimensions and density.</p> <p>A. The shoreline dimensions table in subsections B. and C. of this section establishes the shoreline standards within each of the shoreline environments.</p>	<p><i>No response required.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE																												
<p>B. The dimensions enumerated in this section apply within the shoreline jurisdiction. If there is a conflict between the dimension standards in this section and K.C.C. chapter 21A.12, the more restrictive shall apply.</p> <p>Shoreline dimensions.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Conservancy</th> <th style="text-align: center;">Forestry</th> <th style="text-align: center;">Aquatic</th> </tr> </thead> <tbody> <tr> <td colspan="4">Standards</td> </tr> <tr> <td>Base height</td> <td style="text-align: center;">35 feet (1)</td> <td style="text-align: center;">35 feet (1)</td> <td style="text-align: center;">35 feet (1)</td> </tr> <tr> <td>Maximum density (units per acre)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Minimum lot area</td> <td style="text-align: center;">5 acres (2)</td> <td style="text-align: center;">80 acres</td> <td></td> </tr> <tr> <td>Minimum lot width</td> <td style="text-align: center;">150 feet</td> <td style="text-align: center;">150 feet</td> <td></td> </tr> <tr> <td>Impervious surface</td> <td style="text-align: center;">10% (3)</td> <td></td> <td></td> </tr> </tbody> </table>		Conservancy	Forestry	Aquatic	Standards				Base height	35 feet (1)	35 feet (1)	35 feet (1)	Maximum density (units per acre)				Minimum lot area	5 acres (2)	80 acres		Minimum lot width	150 feet	150 feet		Impervious surface	10% (3)			<p><i>No buildings will be constructed. Installed structures consist of utility poles. The project complies with the shoreline dimensions and density as discussed below under C. Development conditions.</i></p>
	Conservancy	Forestry	Aquatic																										
Standards																													
Base height	35 feet (1)	35 feet (1)	35 feet (1)																										
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<p>C. Development conditions.</p> <p>1. This height can be exceeded consistent with the base height for the zone only if the structure will not obstruct the view of a substantial number of residences on areas adjoining the shoreline or if overriding considerations of the public interest will be served, and only for:</p>	<p><i>Please see response above for (B).</i></p>																												
<p>2. The minimum lot areas may be reduced as follows:</p>	<p><i>No new lots are being created.</i></p>																												
<p>3. For lots created before the December 10, 2010, if achieving the ten percent maximum impervious surface limit is not feasible, the amount of impervious surface shall be limited to the maximum extent practical but not to exceed the amount of impervious surface allowed under K.C.C. 21A.12.030 and 21A.12.040.</p>	<p><i>The proposed work is within existing developed road rights-of-way. New impervious surfaces are limited to the concrete pad at the base of the outdoor warning siren poles and the concrete foundation approximately 2'6" in diameter and 10-feet deep at the base of the highway message signs. OWS 10, HMS 2, and HMS 4 are located within the Conservancy Shoreline Environment and have minimized the impervious surface required.</i></p>																												
<p>4. Except for a mixed use development, the density of the underlying zoning or 6 units per acre, whichever is lower. A mixed use development may have the density of the underlying zone. (Ord. 17485 § 30, 2012; Ord. 16985 § 47, 2010).</p>	<p><i>No residential development is proposed.</i></p>																												

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>21A.25.240 Historic resources. Historic resources include historic buildings, sites, objects, districts and landscapes, prehistoric and historic archaeological resources and traditional cultural places. Development within shoreline environments shall protect historic resources as follows:</p>	<p><i>Cultural resource surveys are in progress.</i></p>
<p>21A.25.260 New Utility facilities and repair and replacement of existing utility facilities. A. To the maximum extend practical, new utility and transmission facilities shall:</p> <ol style="list-style-type: none"> 1. Avoid disturbance of unique and fragile areas 	<p><i>All project locations in Shoreline jurisdiction occur within the existing developed road prism.</i></p>
<ol style="list-style-type: none"> 2. Avoid disturbance of wildlife spawning, nesting, and rearing areas 	<p><i>All project locations in Shoreline jurisdiction occur within the existing developed road prism. No wildlife spawning, nesting or rearing area will be disturbed.</i></p>
<ol style="list-style-type: none"> 3. Overhead utility facilities shall not be permitted in public parks, monuments, scenic recreation, or historic areas 	<p><i>Proposed project components are not located in monuments, scenic recreation, or historic areas. OWS 10 is located on the developed road prism bordering MacDonald Park in the City of Carnation. No overhead lines are proposed.</i></p>
<ol style="list-style-type: none"> 4. Avoid changing groundwater patterns and hyporheic flows that support streams and wetlands 	<p><i>The proposed structures have a minimal footprint and are not anticipated to affect groundwater patterns or hyporheic flows.</i></p>
<ol style="list-style-type: none"> 5. Not be located within the Natural shoreline unless the utility is low intensity; and 	<p><i>The proposed project is a low intensity utility with minimal impacts.</i></p>
<ol style="list-style-type: none"> 6. Avoid locating new utility and transmission facilities in tidelands or in or adjacent to the Maury Island aquatic reserve. 	<p><i>No tidelands are present in the project vicinity. Maury Island aquatic reserve is also outside the project area.</i></p>
<p>B. New utility distribution and transmission facilities shall be designed to:</p> <ol style="list-style-type: none"> 1. Be located outside the shoreline jurisdiction where feasible 	<p><i>No new utility distribution or transmission facilities are proposed. Project locations within shoreline jurisdiction have been minimized to the extent feasible</i></p>
<ol style="list-style-type: none"> 2. Be located within existing rights of way and utility corridors where feasible 	<p><i>The project components within Shoreline jurisdiction are located within existing rights of way.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
3. Minimize visual impact	<i>The highway message signs have been designed to the standards of WSDOT and will be approved by WSDOT. OWS poles will be located on the road prism and visual impact has been minimized to the extent feasible.</i>
4. Harmonize with or enhance the surroundings	<i>The project components visual impacts have been minimized to the extent feasible while achieving the goal of warning people of safety hazards.</i>
5. Not create a need for shoreline protection; and	<i>The project components have a minimal footprint and are outside of stream banks. As a result, the impacts are not anticipated to trigger shoreline protection.</i>
4. To the maximum extend practical, use natural screening.	<i>Natural screening is not feasible due to location of the HMS on the highway corridor. Outdoor warning sirens are located on developed road prism.</i>
C. To the maximum extent practical the construction, repair, replacement, and maintenance of utility facilities shall: 1. Maximize the preservation of natural beauty and conservation of resources	<i>The project components visual impacts have been minimized to the extent feasible while achieving the public safety goals.</i>
2. Minimize scarring of the landscape	<i>The project components within Shoreline jurisdiction are located on existing developed rights of way and will result in minimal scarring to the landscape.</i>
3. Minimize siltation and erosion	<i>The project has been designed to minimize siltation and erosion and TESC measures have been included in the project plans.</i>
4. Protect trees, shrubs, grasses, natural features, and topsoil from drainage; and	<i>The project components within Shoreline jurisdiction are located on existing rights of way and will not result in a substantial change in drainage.</i>
5. Avoid disruption of critical aquatic and wildlife stages.	<i>The project components within Shoreline jurisdiction are located on existing rights of way and will not affect critical aquatic or wildlife habitat.</i>
D. Rehabilitation of areas disturbed by the construction, repair, replacement, or maintenance of utility facilities shall: 1. Be accomplished as rapidly as possible to minimize soil erosion and to maintain plant and wildlife habitats; and	<i>Rehabilitation of disturbed areas will be accomplished as rapidly as possible to minimize soil erosion and to maintain plant and wildlife habitats.</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
2. Use plantings compatible with the native vegetation.	<i>Area will be reseeded with a grass seed mix appropriate to the existing right-of-way vegetation.</i>
E. Solid waste transfer stations shall only be permitted within the High Intensity shoreline environment; and	<i>No solid waste transfer stations are proposed.</i>
F. Utility production and processing facilities, such as power plants and sewage treatment plants, are not allowed within the shoreline jurisdiction.	<i>No utility production and processing facilities are proposed.</i>

Shoreline Substantial Development Permits

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>21A.25.290 Development limitations - mitigation - substantial development - record of review - conditions of approval - programmatic statement of exemption - exception to statement of exemption.</p> <p>A. Development within the shoreline jurisdiction, including preferred uses and uses that are exempt from permit requirements, shall be undertaken only if that development is consistent with the policies of RCW 90.58.020, chapter 173-26 WAC and the King County Shoreline Master Program and will not result in a net loss of shoreline ecological functions or in a significant adverse impact to shoreline uses, resources and values, such as navigation, recreation and public access. The proponent of a shoreline development shall employ measures to mitigate adverse impacts on shoreline functions and processes following the sequencing requirements of K.C.C. 21A.25.080.</p>	<p><i>The following sections addresses consistency with the policies of RCW 90.58.020, 173-26 WAC, and the King County Shoreline Master Program.</i></p>
<p>21A.25.290 Development limitations - mitigation - substantial development - record of review - conditions of approval - programmatic statement of exemption - exception to statement of exemption.</p> <p>B. A substantial development permit shall be required for all proposed uses and modifications within the shoreline jurisdiction unless the proposal is specifically exempt from the definition of substantial development in RCW 90.58.030 and WAC 173-27-040 or is exempted by RCW 90.58.140, WAC 173-27-044 or WAC 173-27-045. If a proposal is exempt from the definition of substantial development, a written statement of exemption is required for any proposed uses and modifications if:</p> <ol style="list-style-type: none"> 1. WAC 173-27-050 applies; or 2. The proposed use or modification will occur waterward of the ordinary high water mark except for the maintenance of agricultural drainage that is not used by salmonids or as otherwise provided in subsection F. of this section. 	<p><i>The applicant understands this concept.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>RCW 90.58.020 Legislative findings—State policy enunciated—Use preference.</p> <p>The legislature finds that the shorelines of the state are among the most valuable and fragile of its natural resources and that there is great concern throughout the state relating to their utilization, protection, restoration, and preservation. In addition it finds that ever increasing pressures of additional uses are being placed on the shorelines necessitating increased coordination in the management and development of the shorelines of the state. The legislature further finds that much of the shorelines of the state and the uplands adjacent thereto are in private ownership; that unrestricted construction on the privately owned or publicly owned shorelines of the state is not in the best public interest; and therefore, coordinated planning is necessary in order to protect the public interest associated with the shorelines of the state while, at the same time, recognizing and protecting private property rights consistent with the public interest. There is, therefore, a clear and urgent demand for a planned, rational, and concerted effort, jointly performed by federal, state, and local governments, to prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines.</p> <p>It is the policy of the state to provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses. This policy is designed to insure the development of these shorelines in a manner which, while allowing for limited reduction of rights of the public in the navigable waters, will promote and enhance the public interest. This policy contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary rights incidental thereto.</p> <p>The legislature declares that the interest of all of the people shall be paramount in the management of shorelines of statewide significance. The department, in adopting guidelines for shorelines of statewide significance, and local government, in developing master programs for shorelines of statewide significance, shall give preference to uses in the following order of preference which:</p> <p>(1) Recognize and protect the statewide interest over local interest</p>	<p><i>This shoreline substantial development permit is part of a larger project to make improvements to the currently failing Tolt Dam Early Warning System (TEWS). The project has several other locations outside shoreline jurisdiction and the locations within Shoreline jurisdiction have been minimized. TEWS is a critical life safety system that alerts residents in and around the City of Carnation of an imminent dam breach or failure at the Tolt Reservoir. This project is in the statewide interest.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
(2) Preserve the natural character of the shoreline	<i>The proposed components are located within the developed road prism and do not alter the natural character of the shoreline.</i>
(3) Result in long term over short term benefit	<p><i>The existing warning system was constructed in approximately 1985 and modified several times in the following years. Potential problems and issues identified in the existing system include outdated components no longer supported by the manufacturers and old technology with security vulnerabilities that could result in a system shutdown from a single point of failure. The longevity of the TEWS relies on maintenance and updates.</i></p> <p><i>The proposed improvements will provide critical safety warnings to the public and will result in long term benefit to the residents of the area and the general public.</i></p>
(4) Protect the resources and ecology of the shoreline	<i>The project is designed to avoid adverse impacts to resources and ecology. Supporting materials are included in the application.</i>
(5) Increase public access to publicly owned areas of the shorelines	<i>The proposed project elements do not alter public access to publicly owned areas of the shoreline.</i>
(6) Increase recreational opportunities for the public in the shoreline	<i>The proposed project elements do not alter recreational opportunities within the shoreline.</i>
(7) Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary.	<i>The applicant is not aware of any other elements deemed appropriate or necessary.</i>
173-26 WAC State Master Program Approval/Amendment Procedures and Master Program Guidelines	<i>On December 4, 2019, the King County Council adopted the 2019 Shoreline Master Program Periodic Review with Ordinance 19034. The proposed project does not require an amendment to the current King County Shoreline Master Program.</i>

King County Shoreline Master Program

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>III. Shoreline Policy Goals</p> <p>A. Introduction to Shoreline goals</p> <p>B. Statement of Applicability</p> <p>S-201 All proposed uses and development occurring within King County's shoreline jurisdiction must conform to RCW Chapter 90.58, the Shoreline Management Act, and to King County's Shoreline Master Program.</p>	<p><i>Within this narrative, compliance with RCW Chapter 90.58, the Shoreline Management Act, and King County's Shoreline Master Program has been addressed.</i></p>
<p>C. Shoreline Preferred Uses</p> <p>S-202 In establishing and implementing shoreline policies and development regulations, King County shall give preference to uses that are unique to or dependent upon a shoreline location</p>	<p><i>The proposal is for shoreline permit approval for project components within shoreline jurisdiction. This use is not water-dependent, water-related, or water-enjoyment. The proposed component locations are necessary for the TEWS replacement, which is a critical safety system in the shoreline.</i></p>
<p>S-203 King County, when determining allowable uses and resolving use conflicts in the shoreline jurisdiction, shall apply the following preferences and priorities in the order listed below:</p> <p>a. Reserve appropriate areas for protecting and restoring shoreline ecological processes and functions to control pollution and prevent damage to the natural environment and to public health.</p>	<p><i>The proposal will limit work in the shoreline area to the maximum extent practical in order to minimize impacts to shoreline ecological processes. The project impacts are not predicted to extend beyond the developed road prism.</i></p>
<p>b. Reserve shoreline areas for water-dependent and associated water-related uses. Harbor areas, established pursuant to Article XV of the State Constitution, and other areas that have reasonable commercial navigational accessibility and necessary support facilities, such as transportation and utilities, should be reserved for water-dependent and water-related uses that are associated with commercial navigation, unless adequate shoreline is reserved for future water-dependent and water-related uses and unless protection of the existing natural resource values of such areas preclude such uses. Shoreline mixed-use developments may be allowed if they include and</p>	<p><i>The proposal is not within a Harbor area or near streams with reasonable commercial navigation accessibility. The proposal is not a mixed-use development project.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>support water-dependent uses and address specific conditions that affect water-dependent uses.</p>	
<p>c. Reserve shoreline areas for other water-related and water-enjoyment uses that are compatible with ecological protection and restoration objectives.</p>	<p><i>The proposal limits the work in the shoreline area to the maximum extent practical and does not preclude future development of other water-related and water-enjoyment uses (e.g., hiking trails).</i></p>
<p>d. Locate single family residential uses where they are appropriate and can be developed without significant impact to shoreline ecological processes and functions or displacement of water-dependent uses.</p>	<p><i>The proposal does not include single-family residences.</i></p>
<p>e. Limit nonwater-oriented uses to those locations that are inappropriate for higher priority uses or where the nonwater-oriented uses demonstrably contribute to the objectives of the Shoreline Management Act.</p>	<p><i>The proposed improvements to the TEWS, which will occur on existing rights of way, are non-water-oriented uses. The proposed improvements cannot avoid work within shoreline environments given the public safety needs of the network. There are currently no water-dependent, water-related, or water-enjoyment uses within or adjoining the project areas.</i></p>
<p>S-204 In particular circumstances, the preferred use policies, the local economic and land use conditions, and the policies and regulations that assure protection of shoreline resources may result in a determination that other uses may be considered as necessary or appropriate. These other uses may be accommodated, provided that the preferred uses are reasonably provided for throughout the shoreline jurisdiction.</p>	<p><i>The proposed use is a Utility facility. Although not a preferred use, Utility facilities are listed as allowed by shoreline conditional use permit in the Aquatic Environment and allowed by shoreline substantial development permit in the Conservancy, Residential, and Resource Environment. The proposed project components are necessary for the efficiency and longevity of the TEWS.</i></p>
<p>D. General Policy Goals</p> <p>S-205 The following policy goals apply to all shorelines in the shoreline jurisdiction. The goals are not ranked in importance and have been assigned a number for identification purposes only.</p> <p>a. The use of shorelines for those economically productive uses that are particularly dependent on shoreline location or use.</p>	<p><i>The proposal includes highway message sign and outdoor warning siren locations are within shoreline jurisdiction. The proposed components, as part of the greater TEWS improvement, are specifically dependent on a shoreline location, since the proposed improvements to the TEWS provide critical safety warnings to residents of the shoreline area and the travelling public.</i></p>
<p>b. The use of shorelines and the waters they encompass for public access and recreation.</p>	<p><i>The project will not provide public access or recreation, nor will it preclude future public access or recreation.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
c. Protection and restoration of the ecological processes and functions of shoreline natural resources.	<i>Project impacts are not anticipated to extend beyond the existing developed portions of the right of way; proposed actions do not alter ecological processes or functions of shoreline natural resources.</i>
d. Protection of the public right of navigation and corollary uses of waters of the state.	<i>The project will not affect the public right of navigation or related uses of waters of the state.</i>
e. The protection and restoration of buildings and sites having historic, cultural, and educational value	<i>There are no listed or known buildings or sites having historic, cultural, and educational value within the proposed work areas.</i>
f. Planning for public facilities and utilities correlated with other shorelines uses.	<i>The proposed designs are correlated with other utilities and public facilities. More specifically, the proposed work is within existing developed rights-of-way and confined to the road prism.</i>
g. Prevention and minimization of flood damage.	<i>The proposed project effects are expected to alter the floodway as the poles are less than 18 inches in diameter and located within existing developed road prisms.</i>
h. Recognizing and protecting private property rights.	<i>The proposed work areas are within developed rights-of-way or in other public property.</i>
i. Preferential accommodation of single-family residential uses.	<i>The proposal does not include single-family residential uses.</i>
j. Coordination of shoreline management with other relevant local, state and federal programs.	<i>This project involves the following agencies and permits:</i> <ul style="list-style-type: none"> • <i>Washington State Department of Ecology, Coastal Zone Management (CZM) Certification of Consistency</i> • <i>King County, local permits. These may include a Building Permit, a Clearing and Grading Permit, Floodplain Permit, and other permits as determined by the County.</i>
E. Shorelines of Statewide Significance Policy Goals	<i>Project components are located within Shoreline Environments of Statewide Significance. The policy goals are discussed in the following sections.</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>S-206 The interests of all people shall be paramount in the management of shorelines of statewide significance within King County.</p>	<p><i>This shoreline substantial development permit is part of a larger project to make improvements to the currently failing Tolt Dam Early Warning System (TEWS). The project has several other locations outside shoreline jurisdiction and the locations within Shoreline jurisdiction have been minimized. TEWS is a critical life safety system that alerts residents and travelers in and around the City of Carnation of an imminent dam breach or failure at the Tolt Reservoir. This project is in the statewide interest.</i></p>
<p>S-207 In developing and implementing its Shoreline Master Program for shorelines of statewide significance, King County shall give preference, in the following order of preferences, to uses that:</p> <p>a. Recognize and protect the statewide interest over local interest.</p>	<p><i>Please see response to (S-206) above.</i></p>
<p>b. Preserve the natural character of the shoreline.</p>	<p><i>The proposed components are located on developed road prism and do not alter the natural character of the shoreline.</i></p>
<p>c. Result in long-term over short-term benefit.</p>	<p><i>The existing warning system was constructed in approximately 1985 and modified several times in the following years. Potential problems and issues identified in the existing system include outdated components no longer supported by the manufacturers and old technology with security vulnerabilities that could result in a system shutdown from a single point of failure. The longevity of the TEWS relies on maintenance and updates.</i></p>
<p>d. Protect the resources and ecology of the shoreline.</p>	<p><i>The project is designed to avoid adverse impacts to resources and ecology. Supporting materials are included in the application.</i></p>
<p>e. Increase public access to publicly owned areas of the shoreline.</p>	<p><i>The proposed project elements do not alter public access to publicly owned areas of the shoreline.</i></p>
<p>f. Increase recreational opportunities for the public in the shoreline.</p>	<p><i>The proposed project elements do not alter recreational opportunities for the public in the shoreline.</i></p>
<p>g. Provide for any other element as defined in Revised Code of Washington 90.58.100</p>	<p><i>No response required. These are actions to be taken by King County and not directed at applicants for shoreline permits.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>S-208 In developing and implementing policies relating to shorelines of statewide significance, King County shall provide for optimum implementation of policies that satisfy the statewide interest.</p>	<p><i>No response required. These are actions to be taken by King County and not directed at applicants for shoreline permits.</i></p>
<p>F. State-Owned Shoreline Policy Goals S-209 King County should encourage and help facilitate the use of state-owned shorelines for public recreational activities, where appropriate.</p>	<p><i>The proposed project will not alter access or availability of state-owned shorelines for public recreational activities.</i></p>
<p>G. Balancing Policy Goals S-210 The policy goals of King County's Shoreline Master Program relate both to the use and protection of the extremely valuable and vulnerable shoreline resources of the state.</p>	<p><i>The application materials include a Critical Areas Assessment related to the protection of shoreline resources.</i></p>
<p>S-211 King County shall accommodate in the shoreline jurisdiction all reasonable and appropriate uses consistent with protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and consistent with public rights of navigation.</p>	<p><i>The use proposed is categorized as a Utility facility. Utility Facilities are permitted by Shoreline Substantial Development permit in the Conservancy, Residential, and Resource Shoreline Environments. The approval of the shoreline permits will allow the needed improvements to the TEWS, which is a measure to protect the health and safety of the public.</i> <i>A Shoreline Conditional Use permit is required in the Aquatic Environments; however, no in-water work is proposed, and no project components are located in the Aquatic Environments.</i></p>
<p>S-212 The policy of achieving both shoreline use and protection is reflected in the provision that permitted uses in the shorelines of the state shall be designed and conducted in a manner to avoid or minimize, in so far as practical, any resultant damage to the ecology and environment of the shoreline area and the public's use of the water.</p>	<p><i>Work within the shoreline area will be limited to the maximum extent practical to protect existing ecological processes and functions. The proposal does not preclude the public's use of the water.</i></p>
<p>S-213 King County shall balance shoreline use and shoreline protection when meeting the policy goals of the Shoreline Management Act.</p>	<p><i>Approval of the required shoreline permits is needed to allow the installation of public safety sirens and signs. Work in shoreline zones has been minimized to the extent feasible given the public safety purpose of the TEWS components.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>H. Multiple Approaches to Accomplishing Policy Goals</p> <p>S-214 The King County Shoreline Master Program policies may be achieved by a number of different means, both regulatory and non-regulatory. These include, but are not limited to:</p> <p>a. Regulations controlling development within the shoreline jurisdiction</p>	<p><i>The King County Zoning Code at 21A.25 sets out shoreline regulations. These are addressed later in this narrative.</i></p>
<p>b. Acquisition of land and easements by purchase, lease, or gift, either alone or in concert with other local governments</p>	<p><i>The applicant is not aware of specific land acquisitions related to the project.</i></p>
<p>c. Accepting grants, contributions, and appropriations from any public or private agency or individuals</p>	<p><i>The applicant is not aware of grants, contributions, and appropriations from any public or private agency or individuals.</i></p>
<p>d. Public facility and park planning</p>	<p><i>The applicant is not aware of any public facility and park planning that would affect the proposed development or be affected by the proposed development.</i></p>
<p>e. Watershed planning</p>	<p><i>The applicant is aware of the Snohomish Basin Protection Plan dated December 2015 and prepared by Snohomish County Surface Water Management, King County Snoqualmie Watershed Forum Staff, and Tulalip Tribes Natural Resources Department.</i></p>
<p>f. Voluntary salmon recovery projects; and</p>	<p><i>The applicant is not aware of any voluntary salmon recovery projects that would affect the proposed development or be affected by the project.</i></p>
<p>g. Incentive programs, such as the transfer of development rights or the public benefit rating system.</p>	<p><i>The applicant is not aware of any incentive programs that would affect the proposed development or be affected by the proposed development.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>IV. Shoreline Element Policy Goals</p> <p>A. Need for shoreline elements</p> <p>B. Economic Development Element</p> <p>S-301 King County should plan for the location and design of industries, transportation facilities, port facilities, tourist facilities, commerce and other developments that are particularly dependent on their location Lands on or use of the shorelines of the state.</p>	<p><i>No response required. These are actions to be taken by King County and not directed at applicants for shoreline permits.</i></p>
<p>C. Public Access Element</p> <p>S-302 King County shall:</p> <p>a. Support the public interest with regard to rights to access waters held in public trust by the state, while protecting private property rights and public safety, as well as considering impacts on shoreline ecological processes and functions.</p>	<p><i>The proposed project impacts are not anticipated to extend beyond the developed road prism and therefore shall not alter rights to access waters. All project components are located on publicly owned rights of way, or the SPU owned and operated Tolt Dam site. There are no anticipated impacts on shoreline ecological processes and functions.</i></p>
<p>b. Protect the rights of navigation and the space necessary for water-dependent uses.</p>	<p><i>Proposed improvements will not affect rights of navigation or the space necessary for water-dependent uses.</i></p>
<p>c. To the greatest extent feasible consistent with the overall best interest of the state and the people generally, protect the public's opportunity to enjoy the physical and aesthetic qualities of shorelines of the state, including views of the water.</p>	<p><i>The proposed project impacts are not anticipated to extend beyond the developed road prism and therefore shall not alter the public's opportunity to enjoy the physical and aesthetic qualities of shorelines of the state.</i></p>
<p>e. Regulate the design, construction, and operation of permitted uses in the shorelines of the state to minimize, insofar as practical, interference with the public's use of the water.</p>	<p><i>Please see response above for (c).</i></p>
<p>S-303 The King County Shoreline Master Program should increase the amount and diversity of public access to the shoreline jurisdiction in areas identified within a shoreline public access gap. New public access should minimize impacts to shoreline ecological processes and functions, preserve natural shoreline character as much as possible, protect private property rights and consider public safety.</p>	<p><i>Please see response above for (c).</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
S-304 Public agencies, including local governments, port districts, state agencies, and public utility districts, should include public access in their development proposals if public access is compatible with the activity and can be provided safely. An assessment of the impact of public access on the shoreline and constructed features should also be conducted.	<i>The proposed project components do not warrant public access components as the project is not anticipated to alter public access to Shoreline Environments.</i>
S-305 King County shall require public access to shorelines of the state for water-enjoyment, water-related, and nonwater-dependent non-residential uses and for subdivisions of land into more than four parcels unless: <ul style="list-style-type: none"> a. The development proposal is not compatible with public access; 	<i>The proposed project footprint does not extend beyond existing developed road prisms and is not anticipated to alter public access to Shoreline Environments. The development proposal is not compatible with public access.</i>
<ul style="list-style-type: none"> b. There is a safety or security concern; 	<i>Please see response above for (a).</i>
<ul style="list-style-type: none"> c. Inclusion of public access will have an environmental impact that cannot be mitigated; or 	<i>Please see response above for (a).</i>
<ul style="list-style-type: none"> d. There are legal limitations on allowing public access. 	<i>There are no known legal limitations on allowing public access.</i>
S-306 King County shall adopt development regulations that establish maximum building height limits, setbacks, and view corridors to minimize the impact to existing views from public property or a substantial number of residences. Where providing direct public access or allowing for water dependent shoreline uses conflicts with maintaining existing views, the direct public access or water dependent shoreline uses shall have priority.	<i>The County has adopted those provisions. They are contained in 21A.25.220 - Shoreline dimensions and density. These regulations are addressed separately in this narrative.</i>
D. Recreational Element S-307 King County should protect and, when possible, expand recreational opportunities, including but not limited to parks, beaches, tidelands, swimming beaches and boat launches.	<i>The proposed project elements will protect recreational opportunities in the shoreline, and do not preclude future development of recreational opportunities.</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
S-308 King County should evaluate opportunities to acquire shoreline property for purposes of public recreation from willing sellers of private property.	<i>This policy relates to action to be taken by King County. It does not directly relate to this shoreline application.</i>
E. Circulation Element S-309 The King County Shoreline Master Program should guide the County's transportation plans and projects within the shoreline jurisdiction.	<i>This narrative addresses the applicable provisions of the King County Shoreline Master Program. As indicated earlier in this narrative, utility facilities are allowed in all shoreline jurisdictions either as a shoreline substantial development permit or as a shoreline conditional use permit depending on which Shoreline Environment applies.</i>
F. Land Use Element S-310 The King County Comprehensive Plan should consider the policy goals of the King County Shoreline Master Program when designating land use and zoning on shorelines of the state and adjacent lands.	<i>The request does not involve a proposed change in land use or zoning. The project locations will be within public rights-of-way and the SPU owned Tolt Dam site. The land use element does not apply to public rights-of-way.</i>
G. Conservation Element 1. Critical areas S-311 King County shall protect shoreline critical areas and, where possible, should restore degraded habitat and critical area functions and values.	<i>There are critical areas within the project vicinity. The plans, studies, and other documents provided in the application address how the proposal will avoid any significant adverse environmental impacts.</i>
2. Scenic vistas S-312 King County should consider and, when possible, require protection of scenic vistas of the shorelines of the state when reviewing public and private development proposals.	<i>There are no scenic vistas at any of the proposed component locations.</i>
3. Aesthetics S-313 King County should ensure that public and private development proposals protect and restore the aesthetic quality of shorelines in the project design.	<i>To the maximum extent practical, shoreline areas disturbed by the project will be replanted with an appropriate seed mix and will protect the aesthetic quality of the shorelines.</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>H. Historic, Cultural, Scientific and Educational Element</p> <p>S-314 Historic properties in the shoreline jurisdiction should be protected to prevent the destruction of, or damage to, any site having archaeological, historic, cultural, or scientific value through coordination and consultation with the appropriate local, state and federal authorities, including affected Tribes.</p> <p>a Sites should be protected in collaboration with appropriate tribal, state, federal, and other local governments. Cooperation among public and private parties is to be encouraged in the identification, protection, and management of cultural resources.</p>	<p><i>Cultural resource surveys are in progress.</i></p>
<p>b. Where appropriate, access to such sites should be made available to parties of interest. Access to such sites must be designed and managed in a manner that gives maximum protection to the resource.</p>	<p><i>There are no historic properties in the project area with sites having archaeological, historic, cultural, or scientific value.</i></p>
<p>c. Opportunities for education related to archaeological, historical and cultural features should be provided where appropriate and incorporated into public and private programs and development.</p>	<p><i>There are no historic properties in the project area with sites having archaeological, historic, or cultural features.</i></p>
<p>S-315 King County should work with tribal, state, federal and local governments to maintain an inventory of all known historic resources. King County shall protect these inventories from public disclosure to the extent permitted or required under applicable federal and state law. As appropriate, such sites should be preserved and restored for study, education and public enjoyment to the maximum possible extent.</p>	<p><i>21A.25.240 - Historic Resources sets out the procedures for known historic resources and discovery of potentially significant historic resources, or archaeological artifacts. Cultural resource surveys are in progress.</i></p>
<p>S-316 Provisions for historic property preservation, restoration and education should be incorporated with open space or recreation areas in site development plans whenever compatible and possible.</p>	<p><i>Cultural resource surveys are in progress.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
S-317 Cooperation among involved private and public parties should be encouraged to achieve these historic, cultural, scientific and educational objectives.	<i>There are no historic properties in the project area, so cooperation among private and public parties to achieve objectives is not required.</i>
S-318 Private and public owners of historic properties should be encouraged to provide public access and educational opportunities at levels consistent with long term protection of both historic values and shoreline ecological processes and functions. Site-specific conditions may require public site access to be restricted at times, but educational means should be provided whenever possible.	<i>Cultural resource surveys are in progress.</i>
S-319 Historic property development should be planned and carried out so as to prevent impacts to the resource. Impacts to neighboring properties and other shoreline uses should be limited to temporary or reasonable levels.	<i>Cultural resource surveys are in progress.</i>
S-320 Owners of historic resource are encouraged to make substantial development plans known well in advance of application so that appropriate agencies, such as the Washington State Department of Archaeology and Historic Preservation, Tribes and others, may have ample time to assess the site and make arrangements to preserve historic, cultural, scientific and educational values as applicable.	<i>Cultural resource surveys are in progress.</i>
S-321 If development is proposed adjacent to an historic resource, the proposed development should be designed and operated so as to be compatible with continued protection of the historic, cultural or archaeological resource.	<i>Cultural resource surveys are in progress.</i>
<p>V. Shoreline Plan Relationship to Other Laws</p> <p>A. Washington’s Growth Management Act</p> <p>S-401 The King County Shoreline Master Program must be consistent with the Washington State Growth Management Act.</p>	<i>Not applicable to the applicant.</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. King County Countywide Planning Policies</p> <p>S-402 The King County Shoreline Master Program must be consistent with and coordinated with the King County Countywide Planning Policies.</p>	<p><i>Not applicable to the applicant.</i></p>
<p>C. Critical Areas Regulations</p> <p>S-403 The King County Shoreline Master Program and implementing regulations shall provide a level of protection for critical areas in the shoreline jurisdiction that assures no net loss of shoreline ecological functions necessary to sustain shoreline natural resources.</p>	<p><i>The application materials include a Critical Areas Assessment prepared by PBS Engineering and Environmental. The application materials show the proposed project will have negligible impacts to shoreline areas.</i></p>
<p>S-404 The King County Shoreline Master Program includes by reference portions of the King County critical areas regulations into the Shoreline Master Program to meet the requirements of Revised Code of Washington 90.58.090(3) and 90.58.090(4).</p>	<p><i>The applicant is aware of the reference to King County critical area regulations. The application materials include the required studies, reports, and plans to assess the critical areas for the entire TEWS improvement project.</i></p>
<p>D. Zoning, Clearing and Grading, and Stormwater Regulations</p> <p>S-405 To the maximum extent practical, King County's Shoreline Master Program shall rely on King County's existing regulations, including critical areas regulations, surface water management regulations, clearing and grading regulations, and zoning in order to comply with the Shoreline Management Act and the Ecology's guidelines.</p>	<p><i>The materials submitted for the TEWS improvement project include reports, studies, and plans addressing the current Zoning, Clearing and Grading, and Stormwater Regulations.</i></p>
<p>E. Flood Hazard Management Plan</p> <p>S-406 The King County Shoreline Master Program will rely on the policies and programs established in the King County Flood Hazard Management Plan and flood hazard regulations to meet the requirements of the Shoreline Management Act and the Department of Ecology's guidelines for flood hazard reduction</p>	<p><i>The proposed project effects are not expected to alter the floodway as the poles are less than 18 inches in diameter and located within existing developed road prisms. Further discussion of Flood Hazard development restrictions can be found in the Critical Areas Assessment submitted in this application package.</i></p>
<p>VI. Shoreline Environment Designations</p> <p>A. Introduction to shoreline environment designations</p>	<p><i>No response required. These are actions to be taken by King County and not directed at applicants for shoreline permits.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>B. High Intensity Shoreline Environment Purpose The purpose of the High Intensity Shoreline Environment is to provide for high intensity water-oriented commercial and industrial uses.</p>	<p><i>The project areas are not within the High Intensity Environment. Policy Goals S-501 through S-507 are not applicable.</i></p>
<p>C. Residential Shoreline Environment Residential Shoreline Environment Designation Criteria: S-508 A shoreline may be designated Residential Shoreline if the shoreland is characterized by urban levels of residential development or uses or is zoned Urban Residential (R) Urban Reserve (UR) and:</p> <ol style="list-style-type: none"> a. The shoreland does not contain limitations on urban uses, such as geological hazards or flood hazards. 	<p><i>The OWS 9 proposed location is within a Residential Shoreline Environment.</i></p> <p><i>The anticipated impacts do not extend beyond the developed road prism; therefore, no alterations geologic or flood hazard areas are expected to occur.</i></p>
<ol style="list-style-type: none"> b. The shoreline does not provide important shoreline ecological processes and functions that would be significantly compromised by urban levels of residential development. 	<p><i>The anticipated impacts do not extend beyond the developed road prism; therefore, no alterations of shoreline ecological processes and functions are expected to occur.</i></p>
<p>Residential Shoreline Environment Management Policies: S-509 King County shall require that the scale and intensity of new uses and developments within the Residential Shoreline Environment is compatible with and protects or enhances the existing character of the area.</p>	<p><i>The anticipated impacts do not extend beyond the developed road prism and the pole utilized for mounting the OWS will be less than 18-inches in diameter. The proposed project is compatible with the existing character of the area.</i></p>
<p>S-510 King County should encourage public or private outdoor recreation facilities that are compatible with the character of the area in the Residential Shoreline Environment. Water-dependent and water-enjoyment recreation facilities that provide opportunities for people to access and enjoy the shoreline are preferred uses in the Residential Shoreline Environment.</p>	<p><i>The proposed use is a Utility facility. Although not a preferred use, Utility facilities are listed as allowed by shoreline substantial development permit in the Residential Environment. The proposed project component within the Residential Environment is necessary for the efficiency and longevity of the TEWS—a lifesaving system.</i></p>

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S-511 King County should discourage non-water-oriented commercial uses in the Residential Shoreline Environment. A non-water-oriented commercial use may be allowed as part of a shoreline mixed-use development or if the non-water-oriented-use provides a substantial benefit with respect to the goals and policies of this Program, such as providing public access or restoring degraded shorelines.	<i>The proposed project is not a commercial use.</i>
D. Rural Shoreline Environment	<i>The project areas are not within the Rural Shoreline Environment. Policy Goals S-512, S-513, and S-514 are not applicable.</i>
E. Conservancy Shoreline Environment Conservancy Shoreline Environment Designation Criteria S-515 A shoreline may be designated Conservancy Shoreline if it is in an area where important shoreline ecological processes have not been substantially degraded by human activities, where important shoreline ecological processes would be degraded by development or present a public health or safety risk, or where the shoreline is in public ownership and is managed for public access or recreation. Areas that may be included in Conservancy Shoreline are:	<i>OWS 10, as well as HMS 2 and 4NW are within Conservancy Shoreline Environments. HMS 2 is also within a severe Channel migration hazard zone; however, the project footprint does not extend past the developed road prism. OWS 10 and HMS 4NW are within the FEMA floodway and 100-year floodplain respectively. The poles are less than 18 inches in diameter and located within existing developed road prisms.</i>
a. Shoreline reaches primarily within an identified FEMA floodway or severe channel migration hazard zone;	<i>Not applicable, these sites are not in lake or river shorelines with a restoration plan rating of A, B, or D.</i>
b. Lake shorelines or river shorelines with a restoration plan rating of A, B, or D;	<i>Not applicable, these sites are not in a marine shoreline.</i>
c. Marine shorelines with a restoration plan rating of A, B, or D; and	<i>The proposed project is not anticipated to extend beyond existing public rights of way.</i>
d. Shorelines in public ownership and managed for public access or recreation. Conservancy Shoreline Environment Management Policies: S-516 King County should limit uses in the Conservancy Shoreline Environment to those that sustain the shoreline area's physical and biological resources or to uses of a nonpermanent nature that do not	<i>The project area includes construction of two outdoor warning sirens and two highway message signs within Shoreline Conservancy Environments. These are permanent utility facilities, but are within existing developed road rights-of-</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>substantially degrade the rural or natural character of the shoreline area or disturb historic and cultural resources. King County should discourage non-residential uses in the Conservancy Shoreline except as follows:</p> <p>a. King County should allow aquaculture, forestry and agriculture in the Conservancy Shoreline Environment; and</p>	<p><i>way. The project does not propose aquaculture, forestry, or agriculture development.</i></p>
<p>b. King County should allow water-dependent and water-enjoyment recreation facilities as preferred uses if significant adverse impacts to the shoreline are mitigated.</p>	<p><i>The proposed project includes construction of OWS and HMS within Shoreline Conservancy Environments. Updated equipment installation is required to meet the project objectives. Due to the spatial requirements of the system, there is no alternative locations for these components that addresses the public safety goals of the project.</i></p> <p><i>The proposal will not involve aquaculture, forestry, or agricultural uses. It will not be a water-dependent or water-enjoyment use. Utility facilities may be allowed by shoreline substantial development permit approval in the Conservancy Shoreline Environment.</i></p>
<p>S-517 King County shall require that new uses or development in the Conservancy Shoreline Environment preserve the existing character of the shoreline consistent with the purpose of the environment, including:</p> <p>a. Limiting the total effective impervious surface in the shoreline jurisdiction to no more than ten percent in order to maintain the existing hydrologic character of the site; and</p> <p>b. Allowing more effective impervious surface coverage on lots legally created prior to the date of adoption of this update to King County’s Shoreline Master Program. In these cases, effective impervious surface coverage shall be limited to the maximum extent practicable.</p>	<p><i>The proposed project includes installation of two outdoor warning sirens and two highway message signs within the Conservancy Environment. OWS installation requires the addition of a concrete pad at the base of the pole for maintenance purposes. This is the only proposed impervious surface and the size of the concrete pad has been minimized.</i></p> <p><i>Highway message signs will be mounted on an 18-foot tall, 12-inch steel post, bolted to a concrete foundation approximately 2’6” in diameter and 10-feet deep. This is the only proposed impervious surface and the size of the concrete foundation has been minimized to the extent feasible.</i></p>

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<p>F. Resource Shoreline Environment</p> <p>Resource Shoreline Environment Designation Criteria:</p> <p>S-518 A shoreline may be designated Resource Shoreline if the shoreland is zoned Agriculture or Mineral and the shoreline is not designated by Natural Shoreline Under Policy S-525.</p>	<p><i>The proposed locations of HMS 1, 2, and 4 are within the Resource Shoreline Environment. These are permanent utility facilities. The Shorelines are not designated by Natural Shoreline under Policy S-525.</i></p>
<p>Resource Shoreline Environment Management Policies:</p> <p>S-519 King County should limit uses in the Resource Shoreline Environment to agricultural and mining activities.</p>	<p><i>The proposal will not involve agricultural or mining activities. The proposed project activities are restricted to pre-developed rights of way. The impacts to shoreline zones have been minimized to the extent feasible given the and public safety purpose of the TEWS.</i></p>
<p>S-520 King County shall adopt development standards for the Resource Shoreline Environment to preserve the existing character of the shoreline consistent with the purpose of the environment.</p>	<p><i>This requires action by the County and is not applicable to this application.</i></p>
<p>G. Forestry Shoreline Environment</p>	<p><i>The proposal is not in the Forestry Shoreline Environment. Policy Goals S-521 through S-524 are not applicable.</i></p>
<p>H. Natural Shoreline Environment</p>	<p><i>The proposal is not in the Natural Shoreline Environment. Policy Goals S-525 through S-533 are not applicable.</i></p>
<p>I. Aquatic Environment</p>	<p><i>The proposal is not in the Aquatic Resource Shoreline Environment. Policy Goals S-534 through S-540 are not applicable.</i></p>
<p>VII. Environmental Protection Policy Goals</p> <p>A. General Environmental Protection Policy Goals</p> <p>1. Cumulative Impacts and "No Net Loss" of Ecological Processes and Functions</p> <p>S-601 King County shall ensure that new uses, development and redevelopment within the shoreline jurisdiction do not cause a net loss of shoreline ecological processes and functions.</p>	<p><i>The King County Shoreline Master Program includes by reference portions of the King County critical areas regulations into the Shoreline Master Program to meet the requirements of RCW (3) and 90.58.090(4). The application packet contains a Critical Areas Assessment that addresses potential impacts on shoreline ecological process and functions. The proposal results in minimal impacts to shoreline areas.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
S-602 King County should protect shorelines and conduct restoration in areas that have been previously degraded.	<i>This policy relates to actions to be taken by King County. The applicant will comply with all applicable regulations.</i>
S-603 King County shall require shoreline uses and modifications to be designed and managed to prevent degradation of water quality and alteration of natural hydrographic conditions to the maximum extent practical.	<i>The proposed project components are located in existing developed road prism and impacts are not anticipated to extend beyond the rights of way. The proposed actions will not result in degradation of water quality or alteration of natural hydrographic conditions.</i>
S-604 King County's Shoreline Master Program shall include regulations and mitigation standards to ensure that permitted and exempt developments in the aggregate will not cause a net loss of shoreline ecological processes and functions.	<i>The proposed project is not expected to result in a net loss of shoreline ecological processes and functions.</i>
S-605 King County's Shoreline Master Program goals and policies will promote restoration of impaired shoreline ecological processes and functions. Policies and programs and non-regulatory actions that contribute to restoration goals will be identified. King County should consider the direct and indirect effects of regulatory or non-regulatory programs of other local, state, and federal governments, as well as any restoration effects that may result from shoreline development regulations and mitigation standards.	<i>This policy addresses the role of the master program and actions to be taken by King County.</i>
S-606 The King County Shoreline Master Program identifies restoration opportunities and planning elements that together will improve the overall condition of habitat and resources within the shoreline jurisdiction.	N/A.
S-607 King County should provide options for property-specific technical assistance and tailored applications of shoreline management regulations through Rural Stewardship Plans for single family residential uses in the upland areas of the Rural, Conservancy and Natural Shoreline Environments. Rural Stewardship Plans must be consistent with the goals of the Shoreline Management Act and King County Shoreline Protection and Restoration Plan, and ensure no net loss of shoreline ecological processes and functions.	<i>This project does not include any residential development.</i>

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S-608 The King County Shoreline Master Program shall consider the cumulative impacts of reasonably foreseeable future development to ensure no net loss of shoreline ecological processes and functions.	<i>The proposed project addresses maintenance and improvements to an existing public safety system and is not expected to result in cumulative impact.</i>
S-609 The Shoreline Master Program is intended to fairly allocate the burden of addressing cumulative impacts. King County should adopt policies and regulations that are designed to avoid the need for individualized cumulative impacts analysis for commonly occurring and planned development	<i>This requires action by the County and not the applicant.</i>
S-610 King County shall prefer and provide special permitting considerations for docks and piers that are shared among multiple landowners.	<i>The application does not propose any docks and piers that are shared among multiple landowners.</i>
S-611 When updating the Shoreline Master Program, King County should analyze proposed policies and regulations to determine whether they will cause cumulative adverse impacts to the shoreline and consider how such impacts may be avoided. The evaluation of cumulative impacts should consider: <ul style="list-style-type: none"> a. Current condition of the shorelines and associated natural processes b. Reasonably foreseeable future development and shoreline uses c. An appropriate evaluation of the effect on shoreline ecological processes and functions caused by unregulated activities, development exempt from permitting, and effects such as the incremental impact of residential bulkheads, residential piers, or runoff from newly developed properties; and d. Beneficial effects of any established regulatory programs under other local, state, and federal laws. 	<i>This requires action by the County and is not applicable to this application.</i>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>S-612 King County should use the shoreline permitting or shoreline conditional use permitting processes for development proposals that may have impacts that cannot be anticipated or uncommon impacts that have not been considered or identified at time of adoption of the King County Shoreline Master Program to ensure that all impacts are addressed and that there is no net loss of ecological function of the shoreline after mitigation.</p>	<p><i>The application materials address potential impacts to ecological functions of the shoreline. The project is expected to result in negligible impacts to shoreline areas.</i></p>
<p>S-613 King County shall consider and address cumulative impacts of shoreline development on shoreline ecological processes and functions and on shoreline uses given priority under Revised Code of Washington Chapter 90.58.</p>	<p><i>The proposal limits impacts and all work is proposed within the existing road prism to reduce effects to existing and future shoreline uses.</i> <i>Given the ongoing vegetation management and proximity of the work to the existing rights of way, project effects are not expected to be significant. The proposed work also does not preclude future public access.</i></p>
<p>2. Ongoing Evaluation, Review of Cumulative Impacts and Duty to Update King County will periodically review the Shoreline Master Program and make amendments that it determines are necessary to reflect changing local circumstances, new information and improved data, and to meet the requirements of RCW 90.58.080 and applicable guidelines. King County will also monitor actions taken to implement the Shoreline Master Program and the shoreline conditions to inform updates of Shoreline Master Program provisions and improve shoreline management over time.</p> <p>S-614 King County shall periodically review and amend its Shoreline Master Program using a process that inventories and ensures meaningful understanding of current and potential ecological processes and functions provided by affected shorelines.</p>	<p><i>The state Shoreline Management Act requires that counties, cities, and towns review their Shoreline Master Program (SMP) every eight years. The review timetable for local governments is established in RCW 90.58.080 (4), and the completion deadline and process requirements are outlined in WAC 173-26-090. The current King County Shoreline Master Program was adopted by the King County Council on March 28, 2019.</i></p>
<p>B. Shoreline Critical Areas</p> <p>2. Use of scientific and technical information</p> <p>S-615 In considering development regulations to protect shoreline ecological processes and functions, King County shall consider the scientific and technical information contained in functional plans adopted to implement the Comprehensive Plan, adopted watershed plans, King County critical areas regulations and state, Tribal and federal programs.</p>	<p><i>This policy directs King County to develop regulations to protect shoreline ecological processes and functions. The application materials address the applicable regulations.</i></p>

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<p>S-616 King County shall apply the following sequence of steps listed in order of priority in evaluating the impacts of development and redevelopment on critical areas within the shoreline jurisdiction:</p> <ol style="list-style-type: none"> a. Avoid the impacts altogether b. Minimize impacts c. Rectify impacts by repairing, rehabilitating or restoring the affected environment d. Reduce or eliminate the impacts over time e. Compensate for impacts by replacing, enhancing or providing substitute resources; and f. Monitor the impact and taking appropriate corrective measures. 	<p><i>The applicant recognizes the County's priorities. The application materials address impacts on critical areas as well as avoidance and minimization of impacts.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>3. Wetlands</p> <p>S-617 King County wetland regulations shall address the following uses to achieve, at a minimum, no net loss of wetland area and functions:</p> <ul style="list-style-type: none"> a. Removal, excavation, grading, or dredging of soil, sand, gravel, minerals, organic matter, or material of any kind; b. Dumping, discharging, or filling with any material, including discharges of stormwater and domestic, commercial, or industrial wastewater; c. Draining, flooding, or disturbing of the open water level, duration of inundation, or groundwater table; d. Driving of pilings; e. Placing of obstructions; f. Construction, reconstruction, demolition, or expansion of any structure; g. Significant vegetation removal, except for non-conversion forest practices regulated under Revised Code of Washington chapter 76.09; h. Other uses or development that results in a significant ecological impact to the physical, chemical or biological characteristics of wetlands; and i. Activities reducing the functions of buffers. 	<p><i>The King County wetland regulations are found in 21A.24.318 through 345 of the King County zoning code. There are no anticipated wetland impacts.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
S-618 King County shall categorize wetlands within shorelines of the state as provided for in Chapter 4, Environment, of the King County Comprehensive Plan.	<i>Not applicable to this application.</i>
S-619 King County should allow alterations to wetlands only if there is no net loss of wetland functions and values.	<i>The proposal does not include alterations to wetlands.</i>
S-620 King County shall delineate buffers around wetlands to protect and maintain wetland functions. Buffer widths shall be based on ecological function, characteristics and setting, potential impacts with adjacent land use, and other relevant factors.	<i>The application materials include a Critical Areas Assessment prepared by the PBS Engineering and Environmental (PBS), August 2022. This report is one of the elements considered in developing the project plans. All of the wetlands within the shoreline zone will have 300-foot wetland buffers.</i>
S-621 In determining appropriate mitigation measures applicable to shoreline development, the mitigation sequencing requirements described in Washington Administrative Code 173-26-201(2)(e) require that lower priority measures shall be applied only where higher priority measures are determined to be infeasible or inapplicable.	<i>The proposal does not include alterations to wetlands.</i>
<p>S-622 King County may allow compensatory mitigation only after a mitigation sequence is applied (see Policy S-616) and higher priority means of mitigation are determined to be infeasible.</p> <ul style="list-style-type: none"> a. Compensatory mitigation replacement ratios or other mitigation provisions shall consider: <ul style="list-style-type: none"> 1. The risk of failure of the compensatory mitigation action 2. The length of time the compensatory mitigation action will take to replace adequately the impacted wetland functions and values; and 3. The gain or loss of the type, quality, and quantity of the ecological functions of the compensation. b. Performance standards shall be established to evaluate the success of compensatory mitigation. c. Long-term monitoring shall be required to determine if performance standards are met. 	<i>The proposal does not include impacts to wetlands. A full description of impacts to wetlands and wetland buffers as well as other critical areas can be found in the Critical Areas Assessment, Prepared By PBS Engineering and Environmental, August 2022.</i>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>d. Long-term protection and management shall be required for compensatory mitigation sites.</p>	
<p>4. Critical Aquifer Recharge Areas S-623 The King County Shoreline Master Program shall protect critical aquifer recharge areas consistent with the King County Comprehensive Plan and critical areas regulations.</p>	<p><i>Based on King County iMap, the project components are not located in a critical aquifer recharge area, sole source aquifer, or groundwater management area.</i></p>
<p>5. Geologically Hazardous Areas S-624 Development regulations for geologically hazardous areas shall meet the minimum requirements in Washington Administrative Code 365-190-120.</p>	<p><i>This policy is directed toward King County. Washington Administrative Code 365-190-120 lists and describes geological hazardous areas.</i></p>
<p>S-625 King County shall prohibit development and new lot creation in geologically hazardous areas if it would result in increased risk of injury to people or property damage, consistent with K.C.C. chapter 21A.24.</p>	<p><i>The proposal has been designed to meet the requirements of Chapter 21A.24, Critical Areas.</i></p>
<p>S-626 King County shall prohibit new development that requires structural stabilization in geologically hazardous areas. Stabilization will be allowed in these areas only if the stabilization is necessary to protect existing allowed uses, there is no alternative location available, and no net loss of shoreline ecological processes and functions will result. Stabilization measures shall conform to WAC 173-26-231.</p>	<p><i>No structural stabilization is proposed.</i></p>
<p>S-627 King County may allow stabilization structures or measures in geologically hazardous areas to protect existing primary residential structures, if there are no alternatives, including relocation or reconstruction of the residential structure, the stabilization is in conformance with WAC 173-26-231, and no net loss of shoreline ecological processes and functions will result.</p>	<p><i>No existing primary residential structures are near the proposed component locations.</i></p>

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6. Fish and Wildlife Habitat Conservation Areas a. Critical saltwater habitat	<i>The project does not include saltwater habitat. Policy Goals S-628 through S-632 are not applicable.</i>
b. Critical freshwater habitat	<i>The proposed project does not include impacts to freshwater habitat. Project components are located on existing rights of way. Policy Goals S-633 through S-637 are not applicable.</i>
<p>C. Frequently Flooded Areas and Channel Migration Hazard Areas</p> <p>S-638 The policies contained within the King County Flood Hazard Management Plan, or its successor, constitute the policies for the protection of frequently flooded areas and channel migration within shorelines. Provisions implementing these policies are included in the critical areas regulations.</p>	<i>OWS 9 and 10 as well as HMS 1, 3, and 4 are within areas of special flood hazard. The proposed project effects should not alter the floodway as the poles are less than 18-inches in diameter and located on existing developed road prisms.</i>
S-639 King County shall continue mapping channel migration zones on all of its rivers and streams within shoreline jurisdiction where channel migration zones have not already been mapped.	<i>The proposed HMS 2 location coincides with the mapped Tolt River channel migration hazard area (severe); however, the proposed work area is located in the developed road prism.</i>
<p>D. Shoreline Vegetation Conservation</p> <p>S-640 King County shall adopt planning provisions to address vegetation conservation and restoration and regulatory provisions to address conservation of vegetation, as necessary, to assure no net loss of shoreline ecological processes and functions, to avoid adverse impacts to soil hydrology, and to reduce the hazard of slope failures or accelerated erosion.</p>	<i>The county adopted 21A.24 Critical Areas, which addresses vegetation conservation and restoration. The project will have negligible impacts to critical areas or buffers, areas will be restored with appropriate roadside vegetation. No further mitigation is proposed.</i>
S-641 Vegetation conservation provisions apply to all shoreline uses and developments, whether or not the use or development requires a shoreline substantial development permit.	<i>The applicant is aware the vegetation conservation provisions apply to all shoreline uses and developments.</i>
S-642 Vegetation conservation standards shall not apply retroactively to existing uses and structures, such as existing agricultural practices.	<i>The applicant is aware of the aware of this provision.</i>

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<p>S-643 King County should identify which ecological processes and functions are important to the local aquatic and terrestrial ecology, and then conserve sufficient vegetation to maintain these functions. Vegetation conservation areas are not necessarily intended to be closed to use and development, but should provide for management of vegetation in a manner adequate to assure no net loss of shoreline ecological processes and functions.</p>	<p><i>The county adopted 21A.24 Critical Areas, which addresses vegetation conservation and restoration. The project will have negligible impacts to critical areas, areas will be restored with appropriate roadside vegetation. No further mitigation is proposed.</i></p>
<p>S-644 King County should adopt development regulations for vegetated areas along streams, which once supported or could in the future support mature trees, that include buffers of sufficient width to facilitate the growth of mature trees and periodic recruitment of woody vegetation into the water body to support vegetation-related shoreline functions.</p>	<p><i>The county has adopted 21A.24 Critical Areas, which addresses vegetation conservation and restoration. The project will have negligible impacts to critical areas, areas will be restored with appropriate roadside vegetation. No further mitigation is proposed.</i></p>
<p>S-645 King County should adopt mechanisms to implement the vegetation conservation policies of this chapter. These mechanisms may include setback or buffer requirements, clearing and grading standards, regulatory incentives, environment designation standards, or other provisions. Selective pruning of trees for safety and view protection may be allowed. Removal of noxious weeds and invasive vegetation should be allowed as long as appropriate best management practices are followed.</p>	<p><i>The county has adopted 21A.24 Critical Areas, which addresses vegetation conservation and restoration. The project will have negligible impacts to critical areas, areas will be restored with appropriate roadside vegetation. No further mitigation is proposed.</i></p>
<p>E. Water Quality, Stormwater and Non-Point Pollution</p>	
<p>S-646 Shoreline Master Program water quality, stormwater, and non-point pollution policies apply to all development and uses in shorelines of the state that affect water quality.</p>	<p><i>Proposed improvements to the TEWS within shoreline jurisdiction are within developed road prism and are not expected require separate stormwater collection.</i></p>
<p>S-647 King County should work to prevent impacts to water quality and stormwater quantity that would result in a net loss of shoreline ecological functions, degraded aesthetic qualities, loss of recreational opportunities or reduction in water-dependent uses, such as aquaculture and fishing.</p>	<p><i>The proposed improvements are within developed road prism and are not expected to impact water quality and stormwater quantity.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>S-648 King County should ensure mutual consistency between shoreline management provisions and other regulations that address water quality and stormwater quantity, including Public Health—Seattle & King County standards, the Response Design Manual, and King County surface water management regulations. The regulations that are most protective of ecological functions shall apply.</p>	<p><i>The proposed improvements are not expected to affect water or stormwater quantity.</i></p>
<p>S-649 The Shoreline Master Program shall include provisions to implement the water quality, stormwater and non-point pollution policies in this section.</p>	<p><i>The proposed improvements are within developed road prisms and are not expected to require separate stormwater not expected to require separate water quality or stormwater facilities.</i></p>
<p>F. Preparing for Climate Change</p> <p>S-650 King County shall ensure that new projects for and major maintenance or replacement of utilities, roads, and other public infrastructure consider the impacts of sea-level rise in the location, design, and operation of the projects.</p>	<p><i>Per the Sea Level Rise Viewer on the NOAA website, this area is not projected to experience sea-level rise.</i></p>
<p>S-651 Habitat protection and restoration projects in the shoreline jurisdiction shall consider implications of sea-level rise and other climate change impacts to promote resiliency of habitats and species.</p>	<p><i>This proposal is not a habitat protection and restoration project. Also, per the Sea Level Rise Viewer on the NOAA website, this area is not projected to experience sea-level rise.</i></p>
<p>VIII. Shoreline Use & Shoreline Modification</p> <p>B. Shoreline Use</p> <p>1. Generally</p> <p>S-701 King County shall give preference to uses in the shoreline that are consistent with the control of pollution and prevention of damage to the natural environment or are unique to or dependent upon the shoreline.</p>	<p><i>The project has been designed to prevent damage to the natural environment to the extent practical while achieving the goals of emergency planning and public safety.</i></p>
<p>S-702 Development within the shoreline jurisdiction shall protect the public's health, safety, and welfare, as well as the land, including its vegetation and wildlife, and protect property rights while implementing the policies of the Shoreline Management Act.</p>	<p><i>As shown in the submittal, the proposed construction of the TEWS components is designed to meet all applicable provisions of the King Count Shoreline Master Program and the provisions of the Shoreline Management Act.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
S-703 Where there is a conflict between the uses permitted by zoning and the Shoreline Master Program, preference shall be given first to water-dependent uses, then to water-related uses, and finally to water-enjoyment uses.	<i>There is no conflict between the uses permitted by zoning and the Shoreline Master Program. The public right-of-way is not subject to zoning. The use proposed is a utility facility/public safety system.</i>
S-704 Shoreline Master Program development regulations shall ensure no net loss of shoreline ecological processes and functions.	<i>As shown in the application materials, the project will ensure no loss of shoreline ecological processes or functions.</i>
S-705 King County shall adopt use policies and development regulations to achieve consistency among and between shorelands and adjacent lands as required by RCW 90.58.340.	<i>King County has adopted policies and development regulations to achieve consistency among and between shorelands and adjacent lands as required by RCW 90.58.340.</i>
2. Shoreline Conditional Uses	<i>The proposal does not require a Shoreline Conditional Use permit as there are no proposed components within Aquatic Shoreline Environments. Policy Goal S-706 is not applicable.</i>
3. Agriculture	<i>No agricultural uses are proposed. Policy Goals S-707 through S-711 are not applicable.</i>
4. Forestry	<i>No forestry uses are proposed. Policy Goals S-712, S-713, and S-714 are not applicable.</i>
5. Surface Drilling for Oil and Gas	<i>No surface drilling for oil and gas is proposed. Policy Goal S-715 is not applicable.</i>
6. Aquaculture	<i>No aquaculture use is proposed. Policy goals S-716 through S-727 are not applicable to this project.</i>
7. Boating Facilities	<i>No boating facilities are proposed. Policy Goal S-728 is not applicable.</i>
8. Commercial Development	<i>No commercial development is proposed. Policy Goals S-729 through S-733 are not applicable.</i>
9. Industry	<i>No industrial development is proposed. Policy Goals S-734 through S-739 are not applicable.</i>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
10. In-Water Structures	<i>No in-water structures are proposed. Policy Goals S-740 and S-741 are not applicable.</i>
11. Mining	<i>No mining is proposed. Policy Goals S-742 through S-747 are not applicable.</i>
12. Recreational Development	<i>No recreational development is proposed. Policy Goals S-748 and S-749 are not applicable.</i>
13. Residential Development	<i>No residential uses are proposed. Policy goals S-750 through S-755 are not applicable.</i>
14. Transportation and Parking	<i>No transportation and parking are proposed. Policy goals S-756 through S-759 are not applicable.</i>
15. Utilities S-760 Utility facilities shall be designed and located to assure no net loss of shoreline ecological processes and functions, preserve the natural landscape, and minimize conflicts with present and planned land and shoreline uses, while meeting the needs of future populations in areas planned to accommodate growth.	<i>The TEWS improvement project has been designed to assure no net loss of shoreline ecological processes and functions. The components are located on existing developed road prisms and shoreline impacts have been minimized to the extent feasible given the public safety nature of the system. Updating and maintaining the system is crucial as the region's population continues to grow.</i>
S-761 King County shall allow modification of existing utility facilities and the location of new water-oriented portions of utility facilities in the shoreline jurisdiction provided that a mitigation sequence is applied (see policy S-616) and there is no net loss of shoreline ecological processes and functions. To the maximum extent practical, those parts of utility production and processing facilities that are not water-oriented, such as power plants and sewage treatment plants, shall be located outside of the shoreline jurisdiction.	<i>Please see response above for (S-760).</i>
S-762 Transmission facilities for the conveyance of services, such as power lines, cables, and pipelines, shall be located outside of the shoreline jurisdiction where feasible. Transmission facilities located within the shoreline jurisdiction shall assure no net loss of shoreline ecological processes and functions.	<i>There are no transmission facilities associated with this project.</i>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
S-763 Utilities should be located in existing developed rights-of-way and corridors to the maximum extent practical.	<i>The proposed components are located in existing developed rights-of-way and corridors to the maximum extent practical.</i>
S-764 Unless no other feasible alternative location exists, King County should discourage: <ul style="list-style-type: none"> a. Locating pipelines and cables in water, on tidelands or roughly parallel to the shoreline; and b. The development of facilities that may require periodic maintenance that disrupts shoreline ecological processes and functions. King County shall ensure that any utility facilities that are allowed do not result in a net loss of shoreline ecological processes and functions or significant adverse impacts to other shoreline resources and values.	<i>The proposal does not include any pipelines and cables in water, on tidelands, or roughly parallel to the shoreline. The TEWS will require periodic maintenance, however it will not disrupt shoreline ecological processes and functions.</i> <i>The TEWS improvement project has been designed to assure no net loss of shoreline ecological processes and functions.</i>
C. Shoreline Modifications 1. General Policies Governing Shoreline Modifications S-765 King County should allow structural shoreline modifications only when necessary to support or protect a legally established structure or a legally existing shoreline use that is in danger of loss or substantial damage, or when a modification is necessary for reconfiguration of the shoreline for mitigation or enhancement purposes.	<i>The proposed warning siren and signposts have a minimal permanent footprint and are located within developed road prisms. No structural shoreline modifications are proposed.</i>
S-766 In order to reduce the adverse effects of shoreline modifications, King County should limit shoreline modifications in number and extent to the maximum extent practicable.	<i>The proposal includes minimal vegetation clearing in shoreline zones to prepare for access and installation of the OWS and HMS. Given the public safety nature of the system, sites entirely outside of the flood zone are not feasible.</i>
S-767 King County shall only allow shoreline modifications that are appropriate to the specific type of shoreline and environmental conditions for which they are proposed.	<i>The proposal includes minimal vegetation clearing in shoreline zones to prepare for access and installation of the OWS and HMS. Given the public safety nature of the system, sites entirely outside of the flood zone are not feasible.</i>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>S-768 King County shall ensure that shoreline modifications individually and cumulatively do not result in a net loss of shoreline ecological processes and functions. In order to achieve this goal, King County shall give preference to those types of shoreline modifications that have a lesser impact on the shoreline and by requiring mitigation of identified impacts resulting from shoreline modifications.</p>	<p><i>As addressed in this narrative, this project will result in no net loss of shoreline ecological processes and functions.</i></p>
<p>S-769 Where applicable, King County shall develop regulations and impose conditions based on scientific and technical information and a comprehensive analysis of shoreline conditions for drift cells for marine waters or reaches for lakes and river and stream systems.</p>	<p><i>The proposed project will comply with applicable County regulations.</i></p>
<p>S-770 King County should plan for the enhancement of impaired shoreline ecological processes and functions where feasible and appropriate, while accommodating permitted uses. To the maximum extent practical, King County should incorporate appropriate measures to protect shoreline ecological processes and functions from the impacts of shoreline modifications.</p>	<p><i>The proposal will limit work in the shoreline area to the maximum extent practical to minimize impacts to shoreline ecological processes and functions.</i></p>
<p>2. Shoreline Stabilization</p> <p>S-771 King County shall require shoreline stabilization to be consistent with WAC 173-26-221(5) for vegetation retention and WAC 173-26-221(2) for protection of critical areas.</p>	<p><i>No shoreline stabilization is proposed.</i></p>
<p>S-772 King County shall adopt standards to first avoid then mitigate the impact to shoreline ecological processes and functions when alteration of the shoreline is allowed for the construction of single detached dwelling units and accessory structures. These standards shall address the design and type of protective measures and devices that are allowed.</p>	<p><i>The proposal does not include construction of dwelling units and accessory structures.</i></p>
<p>S-773 King County may allow construction of new or replaced structural shoreline stabilization and flood control works to protect an existing structure if King County determines there is a documented need, including a geotechnical analysis that the structure is in danger from shoreline erosion caused by tidal action, currents or waves.</p>	<p><i>The proposal does not include construction of shoreline stabilization or flood control works.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
S-774 King County shall require new shoreline development to be located and designed to avoid the need for future shoreline stabilization to the maximum extent practicable.	<i>The proposed project components will be located on existing developed rights-of-way.</i>
S-775 King County shall require that lots in new subdivisions and short subdivisions to be created so that shoreline stabilization will not be necessary in order for reasonable development to occur, using geotechnical analysis of the site and shoreline characteristics.	<i>No subdivisions are proposed. This policy is not applicable.</i>
S-776 King County shall require new development on steep slopes or bluffs to be set back sufficiently to ensure that shoreline stabilization is unlikely to be necessary during the life of the structure, as demonstrated by a geotechnical analysis.	<i>The project elements are located within existing road prisms and do not result in a new land development.</i>
S-777 King County shall not allow new development that requires shoreline stabilization that will cause significant adverse impacts to adjacent or down-current properties and shoreline areas.	<i>No shoreline stabilization is proposed.</i>
S-778 King County shall notify all prospective developers of new development along Vashon and Maury Islands that their development may be impacted by sea-level rise and should encourage all such new development to be set back a sufficient distance to avoid the need for shoreline protection during the expected life of the development.	<i>Not applicable to this application.</i>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>S-779 King County shall require the use of soft methods of shoreline stabilization to the maximum extent practicable. King County shall allow new hard structural stabilization measures only as follows:</p> <p>a. To protect existing nonwater-dependent development and structures, including single-family residences, if:</p> <ol style="list-style-type: none"> 1. The erosion is not the result of upland conditions, such as the loss of vegetation and drainage; 2. Nonstructural measures, such as locating the development further from the shoreline, planting vegetation, or installing on-site drainage improvements, are not feasible or not sufficient; 3. The need to protect primary structures from damage due to erosion is demonstrated through a geotechnical report submitted by a qualified specialist. The damage must be caused by natural processes, such as tidal action, currents and waves; and 4. Mitigation is provided such that the erosion control structure will not result in a net loss of shoreline ecological processes and functions. 	<p><i>No shoreline stabilization is proposed.</i></p>
<p>b. To protect water-dependent development if:</p> <ol style="list-style-type: none"> 1. The erosion is not the result of upland conditions, such as the loss of vegetation and drainage; 2. Nonstructural measures, planting vegetation or installing on-site drainage improvements are not feasible or not sufficient; 3. The need to protect primary structures from damage due to erosion is demonstrated through a geotechnical report submitted by a qualified specialist; and 4. The erosion control structure will not result in a net loss of shoreline ecological processes and functions. 	<p><i>The proposed project components are not water-dependent structures.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>c. To protect shoreline restoration projects or hazardous substance remediation projects pursuant to RCW chapter 70.105D if:</p> <ol style="list-style-type: none"> 1. Nonstructural measures, planting vegetation or installing on-site drainage improvements are not feasible or not sufficient; and 2. The erosion control structure will not result in a net loss of shoreline ecological processes and functions. 	<p><i>No shoreline stabilization is proposed.</i></p>
<p>S-780 An existing shoreline stabilization structure may be replaced with a similar structure if there is a demonstrated need to protect principal uses or structures from erosion caused by currents, tidal action, or waves.</p>	<p><i>No existing shoreline stabilization structures will be replaced.</i></p>
<p>S-781 King County shall require replaced shoreline protection structures to be designed, located, sized, and constructed to assure no net loss of shoreline ecological processes and functions.</p>	<p><i>No existing shoreline protection structures will be replaced.</i></p>
<p>S-782 Replacement walls or bulkheads protecting a residence shall not encroach waterward as measured at an elevation of two-feet above the current ordinary high-water mark, unless the residence was occupied prior to January 1, 1972, and there are overriding safety or environmental concerns. In such cases, the replacement structure shall abut the existing shoreline stabilization structure and be located on the landward side of the existing structure.</p>	<p><i>The project does not involve residential uses.</i></p>
<p>S-783 If a net loss of ecological processes and functions associated with critical saltwater habitats will result from leaving an existing shoreline protection structure that is proposed for replacement, King County shall require the structure to be removed.</p>	<p><i>Not applicable. The site is not in a critical saltwater habitat.</i></p>
<p>S-784 King County shall encourage the use soft shoreline stabilization measures that use placement or growth of natural materials that closely resemble natural scales and configurations and that provide restoration of shoreline ecological processes and functions waterward of the ordinary high-water mark.</p>	<p><i>No shoreline stabilization is proposed.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
S-785 King County should encourage replaced structural shoreline stabilization located on Vashon and Maury Islands to be relocated outside of the 100-year floodplain whenever possible. The edge of the 100-year floodplain is consistent with a two-foot sea-level rise.	<i>The site is not located on Vashon or Maury Islands.</i>
S-786 When shoreline stabilization is proposed, King County shall require a geotechnical report to address the need to prevent potential damage to a primary structure. The report shall estimate time frames and rates of erosion and the urgency associated with the specific situation. King County should not allow hard armoring solutions, unless a geotechnical report confirms that there is a significant possibility that the structure will be damaged within three years as a result of shoreline erosion in the absence of such hard armoring measures, or where waiting until the need is immediate would foreclose the opportunity to use measures that avoid impacts on shoreline ecological processes and functions. If the geotechnical report confirms a need to prevent potential damage to a primary structure, but the need is not as immediate as the three years, the report may still be used to justify more immediate authorization to protect against erosion using soft measures.	<i>No shoreline stabilization is proposed.</i>
S-788 If structural shoreline stabilization measures are demonstrated to be necessary, King County shall: <ol style="list-style-type: none"> 1. Limit the size of stabilization measures to the minimum necessary; 2. Require the use of measures designed to assure no net loss of shoreline ecological processes and functions; 3. Require the use of soft approaches, unless they are demonstrated not to be sufficient to protect primary structures, dwellings, and businesses. 	<i>No structural shoreline stabilization is proposed.</i>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>S-789 King County shall ensure that publicly financed or subsidized shoreline erosion control measures do not restrict appropriate public access to the shoreline, except where such access is determined to be infeasible because of incompatible uses, safety, security, or harm to shoreline ecological processes and functions. Where feasible, King County shall require ecological restoration and public access improvements to be incorporated into the project.</p>	<p><i>The project will not require shoreline erosion control measures.</i></p>
<p>S-790 King County shall discourage new development and redevelopment on feeder bluffs. Where a legal building lot exists and the landowner has no option to locate new development or redevelopment away from feeder bluffs and other areas that affect beach sediment-producing areas, King County shall require that they avoid, to the maximum extent practicable, and then minimize the adverse impacts to sediment conveyance systems from erosion control measures.</p>	<p><i>The project sites are not on feeder bluffs.</i></p>
<p>S-791 King County should prioritize feeder bluffs as areas for protection using acquisition, easement, transfer of development rights and other programs that eliminate or reduce development threats.</p>	<p><i>The project sites are not on feeder bluffs.</i></p>
<p>S-792 The impacts of erosion and mass wasting should be mitigated through protection of geological hazardous areas.</p>	<p><i>The project elements are located within existing developed road prisms and are not expected to result in erosion or mass wasting.</i></p>
<p>3. Piers and Docks</p>	<p><i>No piers or docks are proposed. Policy Goals S-793 through S-798 are not applicable.</i></p>
<p>4. Fill S-799 King County shall require fill to be located, designed, and constructed to protect shoreline ecological processes and functions and ecosystem-wide processes, including channel migration and side channels.</p>	<p><i>Fill will be placed below grade at the base of the OWS and HMS support structures and has no anticipated impact on shoreline ecological processes and functions or eco-system wide processes, including channel migration and side channels.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>S-800 King County shall allow fill waterward of the ordinary high-water mark allowed only when necessary to support:</p> <ol style="list-style-type: none"> 1. Water-dependent use; 2. Public access; 3. Cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan; 4. Disposal of dredged material considered suitable under, and conducted in accordance with, the dredged material management program of the Washington Department of Natural Resources; 5. Expansion or alteration of transportation facilities of statewide significance currently located on the shoreline and then only upon a demonstration that alternatives to fill are not feasible; or 6. Mitigation actions, environmental restoration, beach nourishment, enhancement projects and flood risk reduction projects. 	<p><i>No fill will be placed waterward of any ordinary high water mark or in wetlands.</i></p>
<p>S-801 King County shall require a shoreline conditional use permit for fill waterward of the ordinary high-water mark for any use, except for projects for ecological restoration or for the maintenance, repair or replacement of flood protection facilities.</p>	<p><i>No fill will be placed waterward of any ordinary high water mark.</i></p>
<p>5. Breakwaters, Jetties, Groins and Weirs</p>	<p><i>The proposal does not include any breakwaters, jetties, groins, or weirs. Policy goals S-802 through S-805 are not applicable.</i></p>
<p>6. Beach and Dunes Management</p>	<p><i>There are no beaches or associated dunes in King County; therefore, there are no policy goals related to modifications of these features.</i></p>
<p>7. Dredging and Dredge Material Disposal</p>	<p><i>This application does not propose any dredging or dredge material disposal. Policy Goals S-806 through S-810 are not applicable.</i></p>

SHORELINE MANAGEMENT ACT PROVISION	RESPONSES
<p>8. Shoreline Habitat and Natural Systems Enhancement Projects</p> <p>S-811 King County should allow for habitat and natural systems enhancement projects that include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Modification of vegetation; 2. Removal of nonnative or invasive plants; 3. Shoreline stabilization using soft or non-structural techniques; and 4. Dredging, and filling, provided that the primary purpose of such actions is clearly restoration of the natural character and shoreline ecological processes and functions of the shoreline. 	<p><i>The proposal is not a shoreline habitat and natural systems enhancement project.</i></p>
<p>S-812 Habitat and natural systems enhancement projects should assure that the projects address legitimate restoration needs and priorities.</p>	<p><i>The proposal is not a shoreline habitat and natural systems enhancement project.</i></p>
<p>IX. Primary and Administrative Policies</p>	<p><i>The applicant acknowledges that King County has the rights identified in Policies S-901 through S-906 contained within this section of the shoreline master program.</i></p>

Shoreline Conditional Use

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
<p>21A.44.100 Shoreline conditional use.</p> <p>A. A shoreline conditional use shall be granted by the department for conditional uses identified in K.C.C. 21A.25.100 and 21A.25.160 as shoreline conditional uses only if the applicant demonstrates that the review criteria of WAC 173-27-160 have been met.</p>	<p><i>This narrative addresses the requested shoreline conditional use approval requests based on the tables in 21A.25.100 and 21A.25.160.</i></p>
<p>WAC 173-27-160</p> <p>The shoreline conditional use permit criteria in WAC 173-27-160 states:</p> <p>The purpose of a conditional use permit is to provide a system within the master program which allows flexibility in the application of use regulations in a manner consistent with the policies of RCW 90.58.020. In authorizing a conditional use, special conditions may be attached to the permit by local government or the department to prevent undesirable effects of the proposed use and/or to assure consistency of the project with the act and the local master program.</p> <p>(1) Uses which are classified or set forth in the applicable master program as conditional uses may be authorized provided that the applicant demonstrates all of the following:</p> <p>(a) That the proposed use is consistent with the policies of RCW 90.58.020 and the master program;</p>	<p><i>Consistency with RCW 90.58.020 and the master program has been provided in this narrative.</i></p>
<p>(b) That the proposed use will not interfere with the normal public use of public shorelines;</p>	<p><i>This narrative has addressed the normal use of public shorelines. The proposal will not provide access to the shoreline due to the steep slopes and safety issues associated with providing public access from a state highway.</i></p>
<p>(c) That the proposed use of the site and design of the project is compatible with other authorized uses within the area and with uses planned for the area under the comprehensive plan and shoreline master program;</p>	<p><i>This narrative has addressed use compatibility. The proposal is for an emergency warning siren and signage project, which includes construction of new utility poles for these sirens and signs and on developed road prism areas within the shoreline zone. The surrounding land uses are largely agricultural and rural residential. The sites are in road right-of-way and are not zoned, but adjoining areas are within the Rural Area with one dwelling unit (du) per 10-acres (RA-10), Agricultural with one du 35-acres (A-35).</i></p>

SHORELINE MANAGEMENT ACT PROVISION	PROJECT NARRATIVE
(d) That the proposed use will cause no significant adverse effects to the shoreline environment in which it is to be located; and	<i>The narrative has addressed impacts on the shoreline environment. The necessary studies and plans have been prepared to assure no net loss of shoreline processes and functions.</i>
(e) That the public interest suffers no substantial detrimental effect.	<i>The proposal is for signage (utility) improvement. The public interest will be served by providing increased safety to residents and travelers in the Tolt River/Snoqualmie River areas near Carnation, Washington. As shown in the plans, studies, and documents, no net loss of shoreline processes or function will occur. The project does not impact public access.</i>
(2) In the granting of all conditional use permits, consideration shall be given to the cumulative impact of additional requests for like actions in the area. For example, if conditional use permits were granted for other developments in the area where similar circumstances exist, the total of the conditional uses shall also remain consistent with the policies of RCW 90.58.020 and shall not produce substantial adverse effects to the shoreline environment.	<i>This proposed work is a major safety improvement related to the Tolt Dam failure. The work areas are within developed area of the right of way, and are not expected to result in cumulative impacts. Approval of this application will not produce substantial adverse effects to the shoreline environment.</i>
(3) Other uses which are not classified or set forth in the applicable master program may be authorized as conditional uses provided the applicant can demonstrate consistency with the requirements of this section and the requirements for conditional uses contained in the master program.	<i>This application does not request uses that are not included in the shoreline master program or regulations.</i>
(4) Uses which are specifically prohibited by the master program may not be authorized pursuant to either subsection (1) or (2) of this section.	<i>This application does not request approval of uses that are specifically prohibited by the master program.</i>
B. A shoreline conditional use may be granted by the department for uses not classified as conditional uses in K.C.C. 21A.25.100 and 21A.25.160 only if the applicant demonstrates that:	<i>The applicant is not requesting approval of a shoreline conditional use not classified as a conditional use.</i>
C. The burden of proving that a proposed shoreline conditional use meets the criteria enumerated in this section shall be on the applicant. Absence of that proof shall be grounds for denial of the application. (Ord. 19034 § 35, 2019; Ord. 18767 § 18, 2018; Ord. 16985 § 115, 2010; Ord. 3688 § 805, 1978. Formerly K.C.C. 25.32.050).	<i>The applicant is aware of the burden.</i>

Conclusions

As described in this narrative, the proposed Tolt Dam Early Warning System Replacement project complies with the King County shoreline master program and applicable sections of the King County code, Washington Administrative Code, and Revised Code of Washington. The project has been designed to avoid or minimize impacts and project impacts are expected to be minimal given the small footprint of the work and location within existing developed road rights-of-way.