



A. **BACKGROUND**

1. Name of proposed project (if applicable): **Mount Vernon Shoreline Master Program (SMP) Periodic Review**
2. Name of applicant: **City of Mount Vernon, Development Services**
3. Address and phone number of applicant and contact person: **Rebecca Lowell, Principal Planner/Planning Manager – City of Mount Vernon, 910 Cleveland Ave, Mount Vernon, WA (360) 336-6214**
4. Date checklist prepared: **June 9, 2021**
5. Agency requesting checklist: **Washington State Department of Ecology**
6. Proposed project timing or schedule (including phasing, if applicable): **Amendments/Updates to the Mount Vernon Shoreline Master Program (SMP) will be completed by June 30, 2021, with a target adoption by Council, the end of 2021.**
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.
This is a non-project action proposal. The City is updating the policies and regulations of its SMP to ensure consistency with related state and city policies and regulations. Site-specific applications for development within shoreline jurisdiction are considered separate actions and will be reviewed for compliance with the SMP at the time of application.
8. List any environmental information you know about that has been prepared, or will be prepared, directly, related to the proposal.
 - **Shoreline Master Program Periodic Checklist, May 2021**
 - **Cumulative Impact Analysis Addendum, 2021 Mount Vernon SMP Periodic Review dated June 15, 2021.**
9. Do you know of pending applications for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.
No, This is a non-project action.

10. List any government approvals or permits that will be needed for your proposals, if known.

- **The City of Mount Vernon City Council, followed by the Washington State Department of Ecology must approve the changes to the SMP prior to adoption of this proposal.**
- **SEPA Threshold Determination**

11. Give a complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

This is a non-project action and contains updates to the City's Shoreline Master Program that are applied citywide within the identified shoreline jurisdiction of the City of Mount Vernon.

The project area is the shoreline jurisdiction within City limits. A summary of planned regulatory changes includes the following:

- **References to the Community and Economic Development Department or Director have been changed to the Development Services Department or Director.**
- **The procedural requirements for the different types of shoreline permits are organized into one section (versus several) and clarified. No changes were made to the way shoreline permits are processed.**
- **The type of development not requiring a shoreline permit is cross-referenced to State law (WAC 173-27-044 and 173-37-045) and the text of the State law is removed from the SMP.**
- **The description of how shoreline jurisdiction is determined is elaborated upon to ensure jurisdictional areas are properly and consistently identified.**
- **Existing zoning and comprehensive plan designations were added to the list of factors that determine environmental designations.**
- **Figures 2 and 3 within the 2021 SMP map several areas being subject to shoreline jurisdiction that were not identified in the 2011 SMP. Importantly, these areas would have been subject to shoreline jurisdiction under the 2011 plan; however, they were not mapped as potentially being subject to the SMP. These areas are potentially subject to shoreline jurisdiction due to wetlands, that if present, could be associated with, influence, or be influenced by, either the Skagit River or Barney Lake.**

In the 2021 update, the City has identified these parcels that could be subject to shoreline jurisdiction due to the presence of associated wetlands by using cartographically distinct hatching patterns on the revised maps to differentiate these areas from other mapped environmental designations.

Staff analyzed these areas and assigned environmental designations based on the following factors that are listed under sub-section III(B) of the SMP: ecosystem characteristics, environmental functions, restoration potential, existing uses, development and redevelopment potential, existing Zoning and Comprehensive Plan Designations, and public and private plans.

- There are four (4) general areas where the environmental designations were updated or changed to ensure the designations were consistent with the factors listed in sub-section III(B) of the SMP (these factors are also listed in the paragraph immediately above). Descriptions of these areas and the reasons why their designations were changed are provided below. These areas are described in much greater detail in the parcel-by-parcel SMP Mapping Update Summary that is attached to this memo.

Area 1 (mapped on Figures 2 and 3) is located at the far north and northeast portions of the City. Following adoption of the 2011 SMP a new levee was completed along the north side of Hoag Road, east of the Burlington Northern Santa Fe railroad tracts. This new levee is identified on the SMP maps along with areas waterward of the levee, and areas 200 feet landward of the levee as subject to SMP jurisdiction. See the Mapping Update Summary attached to this memo for the justification for the shoreline environmental designations assigned in this location.

Other areas are identified on Figures 2 and 3 as potentially being subject to shoreline jurisdiction, but only if wetlands are found on these areas that influence, or are influenced by, the Skagit River or Barney Lake. These areas were identified following a site-specific review where wetlands were found on a site that were influenced by the Skagit River; and this site was not shown as being subject to shoreline jurisdiction in the City's 2011 SMP. The accompanying Technical Memorandum dated April 30, 2021 from Dr. Lyndon Lee - Mitzell, contains a detailed background and analysis of this site. Once one site was identified staff had Dr. Lee complete an exercise of all nearby properties to see whether or not wetlands on these properties could influence, or be influenced by, the Skagit River or Barney Lake. These properties are shown on Figures 2 and 3 with horizontal lines through them. The justification for the environmental designations for these properties is detailed in the accompanying Mapping Update Summary. Importantly, these areas would have been subject to shoreline jurisdiction under the City's 2011 SMP; but they would have been assigned an environmental designation of Urban Conservancy until the City could update the shoreline map. This 2021 update eliminates the potential for multiple piecemeal map amendments by completing a comprehensive review and update of these areas.

Area 2 (mapped on Figure 5) consists of areas on the east and south side of the Skagit River. Following the adoption of the 2011 SMP the City completed additional portions of a floodwall and levee system that are updated on Figure 5. The newly constructed portions of the floodwall and levee slightly changed the areas subject to shoreline jurisdiction because this jurisdiction is identified as extending 200 feet landward from these areas. The environmental designations in these areas remained as Urban Conservancy on the properties owned by the City on and near the wastewater treatment plant and was kept as Urban Mixed Use on the landward side of the new floodwall and levee of the properties not owned by the City.

Area 3 (mapped on Figure 5) consists of areas waterward of the existing levee within and surrounding the City's Edgewater Park. The 2021 update modified the boundary between the Shoreline Natural and Shoreline Urban Conservancy Environmental Designations such that the Urban Conservancy designation encompasses the portions of Edgewater Park that are used by the public and actively maintained (i.e. mowed and trimmed) by the City's Park and Recreation Department. The Shoreline Urban Conservancy Environmental Designation in this area was also updated such that it extends between the Ordinary High Water Mark (OHWM) of the Skagit River to the existing levee – in the existing SMP this shoreline area is identified as extending from the OHWM but does not extend to the existing levee. See the accompanying Mapping Update Summary for additional details regarding the updates in this location.

Area 4 (mapped on Figure 5) consists of two tax parcels owned by the Mount Vernon School District that are developed as part of Washington Elementary School. The parcel numbers are P26397 and P26391. The 2011 SMP identified the area of these parcels 200 feet landward of the existing levee designated as Shoreline Residential. Because these two parcels are developed as part of an elementary school their designation has been changed to Urban Mixed Use. See the accompanying Mapping Update Summary for additional details regarding the updates in this location.

- The following General policy has been removed from the SMP because it mirrors requirements in existing State law thereby making it unnecessary to have in the City's SMP. This policy is as follows:
 - a. The Director of the Community Development Services Department will periodically initiate review of conditions on the shoreline and conduct appropriate analyses to determine whether or not other actions are necessary to protect and restore the ecology, protect human health and safety, upgrade visual qualities, and enhance residential, commercial, and recreational uses on the City's shorelines. Specific issues to address in such evaluations include, but are not limited to:
 - i. Water quality
 - ii. Conservation of aquatic vegetation (e.g. control of noxious weeds and enhancement of vegetation that supports more desirable ecological functions and recreational conditions)

- iii. Upland vegetation
- iv. Changing visual character as a result of new development, including redevelopment and individual vegetation conservation practices
- v. Shoreline stabilization and modifications

- The currently adopted version of the City’s critical areas ordinance is adopted into Appendix C sans the provisions DOE requires be removed.
- The relief for shoreline restoration projects from WAC 173-27-215 is adopted by reference into the updated SMP.
- The definition of associated jurisdictional wetlands is expanded to include the definition of such found in WAC 173-22-040.
- The date of receipt of the final decision is updated to the date of filing of a final decision throughout the plan.
- A definition for Substantial Development is added to the SMP.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any. If a proposal would occur over a range of area, please provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map if possible. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. (Indicate if maps or plans have been submitted as part of a permit application.)

The proposal is a non-project action. The project location includes a seven-mile portion of the Skagit River, known as the “Big Bend Reach”, and encompasses the waters and all land within 200 feet landward of the ordinary high-water mark (OHWM) of the included portions of the Skagit River, Barney Lake in Unincorporated Skagit County, floodways, and associated wetlands, within City limits.

B. ENVIRONMENTAL ELEMENTS

ITEMS 1 THROUGH 16 ARE FILLED IN WITH INFORMATION THAT IS MORE GENERAL IN NATURE BECAUSE THIS IS A NON-PROJECT ACTION.

- 1. **Earth: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**
 - a. General description of the site (underline one): flat, rolling, hilly steep, slope, mountainous, other.
N/A, this is a non-project action.

- b. What is the steepest slope on the site (approximate % of slope)?
There is a variety of terrain located within the SMP jurisdiction.
 - c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, please specify and note any prime farmland.
Soils within the SMP jurisdiction vary, but include sand and gravel, clay and peat muck in associated wetlands.
 - d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
N/A, this is a non-project action.
 - e. Describe the purposes, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.
N/A, this is a non-project action.
 - f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
N/A, this is a non-project action.
 - g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?
N/A, this is a non-project action.
 - h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:
N/A, this is a non-project action.
2. **Air: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**
- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction, and when the project is completed? If any, generally describe and give approximate quantities known.
N/A, this is a non-project action.
 - b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.
N/A, this is a non-project action.
 - c. What are the proposed measures to reduce or control emissions or other impacts, if any?
N/A, this is a non-project action.
3. **Water: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**

a. Surface:

- 1) Is there any surface water on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, associated wetlands)? If yes, describe type, provide names, and if known, state what stream or river it flows into.
N/A, this is a non-project action. By definition, the SMP addresses marine shorelines, year-round streams with flows over 20 cubic feet per second, lakes equal to or more than 20 acres in size, and associated wetlands and floodways. Regulated shorelines within City limits includes a seven a mile portion of the Skagit River, Nookachamps River and areas 200 feet landward of the ordinary high water mark associated with Barney Lake (located in Unincorporated Skagit County).
- 2) Will the project require any work over or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.
N/A, this is a non-project action.
- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.
N/A, this is a non-project action.
- 4) Will surface water withdrawals or diversions be required by the proposal? Give general description, purpose, and approximate quantities if known.
N/A, this is a non-project action.
- 5) Does the proposal lie within a 100-year floodplain? Note location on the site plan, if any.
N/A, this is a non-project action.
- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.
N/A, this is a non-project action.

b. Ground:

- 1) Will ground water be withdrawn or recharged? Give general description, purpose, and approximate quantities of known.
N/A, this is a non-project action.
- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals; agricultural, etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.
N/A, this is a non-project action.

- c. Water runoff (including storm water):
- 1) Describe the source of runoff and storm water and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, please describe.
N/A, this is a non-project action.
 - 2) Could waste materials enter ground or surface waters? If so, generally describe.
N/A, this is a non-project action.
 - 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.
N/A, this is a non-project action.
- d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:
N/A, this is a non-project action.

4. **Plants: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**

- a. Check or circle types of vegetation found on the site:

- Deciduous tree: alder, maple, aspen, other _____.
- Evergreen tree: fir, cedar, pine, other _____.
- Shrubs
- Grass
- Pasture
- Crop or grain
- Wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other _____.
- Water plants: water lily, eelgrass, milfoil, other _____.
- Other types of vegetation _____.

N/A, this is a non-project action. A variety of vegetation can be found in the shoreline jurisdiction area.

- b. What kind and amount of vegetation will be removed or altered?
N/A, this is a non-project action.
- c. List threatened or endangered species known to be on or near the site.
N/A, this is a non-project action.
- d. List proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:
N/A, this is a non-project action proposal.

- e. List all noxious weeds and invasive species known to be on or near the site.
N/A, this is a non-project action.

5. **Animals: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**

- a. Underline any birds and animals that have been observed on or known to be on or near the site:

Birds: hawk, heron, eagle, songbirds, other _____.

Mammals: deer, bear, elk, beaver, other _____.

Fish: bass, salmon, trout, shellfish, other _____.

N/A, this is a non-project action. A variety of birds, mammals, and fish are known to have habitat within shoreline jurisdiction.

- b. List any threatened or endangered species known to be on or near the site.
N/A, this is a non-project action.

- c. Is the site part of a migration route? If so, explain.

The City of Mount Vernon is located within the Pacific Flyway migration route utilized by waterfowl migrating north into Alaska and northern Canada. The Pacific Flyway extends from Mexico to Canada and Alaska.

- d. List proposed measures to preserve or enhance wildlife, if any:
N/A, this is a non-project action.

- e. List any invasive animal species known to be on or near the site.
N/A, this is a non-project action.

6. **Energy and Natural Resources: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed projects energy needs? Describe whether it will be used for heating, manufacturing, etc.

N/A, this is a non-project action.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

N/A, this is a non-project action.

- c. What kinds of energy conservation features are included in the plans of this proposal?

N/A, this is a non-project action.

7. **Environmental Health: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. [help]

N/A, this is a non-project action.

1) Describe any known or possible contamination at the site from present or past uses.

N/A, this is a non-project action.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

N/A, this is a non-project action.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

N/A, this is a non-project action.

4) Describe special emergency services that might be required.

N/A, this is a non-project action.

5) Proposed measures to reduce or control environmental health hazards, if any:

N/A, this is a non-project action.

b. Noise

1) What types of noise exist in the area that may affect your project (for example: traffic, equipment, operation, other)?

N/A, this is a non-project action.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

N/A, this is a non-project action.

3) What are the proposed measures to reduce or control noise impacts, if any:

N/A, this is a non-project action.

8. **Land and Shoreline Use: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [help]

Land uses include Floodplain, Residential, Commercial, Public, and Public Right of Way.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [help]

N/A, this is a non-project action.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

N/A, this is a non-project action.

c. Describe any structures on the site. [help]

N/A, this is a non-project action.

d. Will any structures be demolished? If so, what? [help]

N/A, this is a non-project action.

e. What is the current zoning classification of the site? [help]

The zoning classification within shoreline jurisdiction includes Residential, Commercial/Industrial, and Other.

f. What is the current comprehensive plan designation of the site? [help]

The Comprehensive Plan designations within shoreline jurisdiction include Medium Density Single-Family, High Density Single-Family, Medium High Density Multi-Family, Open Space, Agricultural, Government Center, Commercial/Industrial, Commercial/Limited Industrial, Downtown Retail/Support Commercial, Community Park, Professional Office, General Commercial, and Schools.

g. If applicable, what is the current shoreline master program designation of the site? [help]

The current Shoreline Environment Designations are Natural, Urban Conservancy, Shoreline Residential, and Urban Mixed-Use.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [help]

Yes, parts of the City's shoreline have been classified as critical areas. The shoreline critical areas identified occur within the batture/an elevated river-bed, or within the active floodplain at the north end of the City where there is no levee. No critical areas were identified within areas of the SMP jurisdiction landward of a levee or revetment.

i. Approximately how many people would reside or work in the completed project? [help]

N/A, this is a non-project action.

j. Approximately how many people would the completed project displace? [help]

N/A, this is a non-project action.

- k. Proposed measures to avoid or reduce displacement impacts, if any: [help]
N/A, this is a non-project action.
- L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [help]
City staff have reviewed the draft amendments in consideration of other adopted or approved City plans, such as the Comprehensive Plan. In addition, the Washington State Department of Ecology must approve the Shoreline Master Plans, which ensures consistency with the Shoreline Management Act and other applicable state laws.
- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:
N/A, this is a non-project action.
9. **Housing: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**
- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
N/A, this is a non-project action.
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income.
N/A, this is a non-project action.
- c. What are proposed measures to reduce or control housing impacts, if any?
N/A, this is a non-project action.
10. **Aesthetics: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**
- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?
N/A, this is a non-project action.
- b. What views in the immediate vicinity would be altered or obstructed?
N/A, this is a non-project action.
- c. What are the proposed measures to reduce or control aesthetic impacts, if any?
N/A, this is a non-project action.
11. **Light and Glare: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.**
- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?
N/A, this is a non-project action.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

N/A, this is a non-project action.

c. What existing off-site sources of light or glare may affect your proposal?

N/A, this is a non-project action.

d. What are the proposed measures to reduce or control light and glare impacts, if any:

N/A, this is a non-project action.

12. Recreation: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.

a. What designated and informal recreational opportunities are in the immediate vicinity?

Edgewater Park and Mount Vernon Lions Club Roadside Park are recreational opportunities located within shoreline jurisdiction.

b. Would the proposed project displace any existing recreational uses? If so, describe.

N/A, this is a non-project action.

c. What are the proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

N/A, this is a non-project action.

13. Historic and Cultural Preservation: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. [help]

N/A, this is a non-project action.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [help]

N/A, this is a non-project action.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]

N/A, this is a non-project action. However, a number of Native American tribes have historically inhabited the Skagit River Valleys, including the Swinomish Tribe, Samish Indian Nation, and the Upper Skagit Indian Tribe. As such, there may be evidence, artifacts, or areas of cultural importance within shoreline jurisdiction.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

N/A, this is a non-project action.

14. Transportation: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

N/A, this is a non-project action.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

N/A, this is a non-project action.

c. How many parking spaces would the completed project have? How many would the project eliminate?

N/A, this is a non-project action.

d. Will the proposal require any new roads or streets, or improvements to any existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

N/A, this is a non-project action.

e. Will the project use or occur in the immediate vicinity of water, rail, or air transportation? If so, generally describe.

N/A, this is a non-project action.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

N/A, this is a non-project action that will not generate any vehicular trips.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

N/A, this is a non-project action.

h. What are proposed measures to reduce or control transportation impacts, if any:

N/A, this is a non-project action.

15. Public Services: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

N/A, this is a non-project action.

b. What are proposed measures to reduce or control direct impacts on public services, if any.

N/A, this is a non-project action.

16. Utilities: This is a non-project action. The following sections of this element are not applicable to the proposed amendments.

- a. Underline utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:
N/A, this is a non-project action.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity that might be needed.
N/A, this is a non-project action.

C. SIGNATURE

The above answers are true to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

A handwritten signature in blue ink, appearing to read "D. Howell".

Signature:

Date Submitted: **July 8, 2021**

SUPPLEMENT SHEET FOR NONPROJECT ACTIONS
(do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, that would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. *Respond briefly and in general terms.*

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The proposed amendments associated with the periodic review of the City's SMP are not anticipated to increase any of the above. The proposed amendments are primarily concerned with keeping the SMP current with amendments to state laws, making usability improvements and clarifications, and ensuring consistency with the City's other plans and development regulations.

a. Proposed measures to avoid or reduce such increases are:

The existing SMP includes restrictions on uses, activities, and development within SMP jurisdiction that prevent the discharge of water or release of toxic or hazardous substances into the water. The standard requires no net loss of ecological functions within the shoreline. Applicable regulations, including Appendix C of the Shoreline Master Program, include a modified version of the City's critical area ordinance and are anticipated to mitigate to a non-significant level impacts of any future associated project-specific actions.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The proposed amendments associated with the periodic review of the City's SMP are not anticipated to significantly affect plants, animals, fish, or marine life. The proposed amendments are primarily concerned with keeping the SMP current with amendments to state laws, making usability improvements and clarifications, and ensuring consistency with the City's other plans and development regulations.

a. Proposed measures to protect or conserve plants, animals, fish, or marine life are:

The existing SMP includes measures to protect or conserve plants, animals, fish, and aquatic life. New development within SMP jurisdiction must demonstrate no net loss of ecological functions within the shoreline.

3. How would the proposal be likely to deplete energy or natural resources?

The proposed amendments associated with the periodic review of the City's SMP are not anticipated to affect the depletion of energy or natural resources. The proposed amendments are primarily concerned with keeping the SMP current with amendments to state laws, making usability improvements and clarifications, and ensuring consistency with the City's other plans and development regulations.

a. Proposed measures to protect or conserve energy and natural resources are:

The proposal will have no effect on energy conservation but is strongly linked to protecting remaining intact natural resources along the shoreline not already impacted by development.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural site, wetlands, floodplains, or prime farmlands?

The proposal includes incorporating areas into the City's shoreline jurisdiction that were not previously included under the last 2011 City of Mount Vernon Comprehensive SMP update. The shoreline environment designations assigned to these areas increases protected habitats, wetlands, and floodplains and acknowledges existing surrounding land uses and development patterns pursuant to the SMP designation criteria. The proposal does not change any general regulations related to environmentally sensitive areas, areas designated (or eligible or under study) for governmental protection (parks, wilderness, wild/scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains or prime farmlands). Park and governmental areas in the City of Mount Vernon located in shoreline jurisdiction include:

- Edgewater Park;
- Lions Park;
- River Front Park and Plaza; and
- Mount Vernon Wastewater Treatment Plant.

a. Proposed measures to protect such resources or to avoid or reduce impacts are:

Applicable regulations, including Environmental Critical Areas regulations and the Shoreline Master Program, are anticipated to mitigate to a non-significant level impacts of any future associated project-specific actions.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposed amendments associated with the periodic review of the City's SMP would not alter land and shoreline uses at this time. The code amendments do not allow or encourage land or shoreline uses incompatible with existing plans. The proposed amendments are primarily concerned with keeping the SMP current with amendments to state laws, making usability improvements and clarifications, and ensuring consistency with the City's other plans and development regulations.

New mapped areas in shoreline jurisdiction were formally identified on the City's Official Shoreline Environment Designation map to provide clearer public information for property owners. It should be noted the subject areas are already part of shoreline jurisdiction per the Shoreline Management Act rules and the SMP Section IV.C.1. These areas were not previously mapped as there are no recent site-specific studies until the 2021 Periodic Update determining shoreline jurisdiction.

a. Proposed measures to avoid or reduce shoreline and land use impacts are:

No such measures are needed.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposed amendments associated with the periodic review of the City's SMP are not anticipated to increase demands on transportation or public services and utilities. The proposed amendments are primarily concerned with keeping the SMP current with amendments to state laws, making usability improvements and clarifications, and ensuring consistency with the City's other plans and development regulations.

a. Proposed measures to reduce or respond to such demand(s) are:

No such measures are needed.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

This non-project proposal includes amendments associated with the periodic review of the City's SMP, which the City is required to complete under the Washington State Shoreline Management Act. Aims of the periodic review include keeping the SMP current with amendments to state laws and exchanges to local plans and regulations.