

EXHIBIT M

Applicant's Technical Memo: "Cumulative Impacts Analysis"

(February 16, 2021)

Date: February 16, 2021
To: Marla Powers, Associate Planner, Poulsbo PED
From: John Piccone, P.E., Soundwest Engineering Assoc.
Carol Tripp, Manager, Port of Poulsbo
Subject: Port response to request for “Shoreline Conditional Use Permit Analysis”

PMC 16.08.120(L) states, “*Proposals for new and expanded shoreline development and uses shall be evaluated for cumulative impacts to shoreline values and functions, per WAC 173-26-201(3)(d)(iii)*”. WAC 173-26-201(3)(d)(iii) requires that, “*Evaluating and addressing cumulative impacts shall be consistent with the guiding principle in WAC 173-26-186 (8)(d)*.”

The guiding principle of the cumulative impact analysis, per WAC 173-26-186(8)(d), is to “[E]valuate and consider cumulative impacts of reasonably foreseeable future development on shoreline ecological functions and other shoreline functions fostered by the policy goals of the act. To ensure no net loss of ecological functions and protection of other shoreline functions and/or uses, master programs shall contain policies, programs, and regulations that address adverse cumulative impacts and fairly allocate the burden of addressing cumulative impacts among development opportunities”, and a complete evaluation of cumulative impacts should consider the following:

- “(i) Current circumstances affecting the shorelines and relevant natural processes;
- (ii) Reasonably foreseeable future development and use of the shoreline; and
- (iii) Beneficial effects of any established regulatory programs under other local, state, and federal laws.”

It is the Port’s understanding that the City of Poulsbo conducts an evaluation of cumulative impacts and no net loss as part of their Shoreline Master Program (SMP). The most recent analysis appears to be the City of Poulsbo Shoreline Master Program Update, Cumulative Impacts Analysis & No Net Loss Summary, dated November 2011. From Section 10, page 41, “[P]rovisions of the draft SMP have been designed to maintain existing shoreline function, produce functional lift where feasible, and result in no net loss of ecological function as required by WAC 173-26-186(8)(d). As discussed in Section 7 of this document, the City of Poulsbo has worked to meet this standard through environmental designations, shoreline policies, and shoreline regulations”.

The Port of Poulsbo Breakwater Replacement project appears to occur in Marine Reach 2 (MR2). The City’s analysis identified creation of additional facilities for the Port of Poulsbo, including overwater development, as a reasonably foreseen future development in this reach. Overall, from Section 10, page 41, “Based upon the minimal amount of foreseeable future development, and the policies and regulations of the SMP, no net loss of ecological function within the City of Poulsbo is anticipated.”

Furthermore, the Port has submitted a Biological Evaluation Report and a Mitigation Plan detailing the ecological and environmental impacts associated with the proposed project and the correlating proposed mitigative measures, concluding that the project results in no net ecological loss of aquatic habitat function. By providing no net loss through the proposed project mitigation (see table 1, page 7, Mitigation Plan) and an analysis of mitigation adequacy (see section 6, Mitigation Plan), the Port has demonstrated its perspective that the proposed project actions would result in no net loss of ecological function at the site relative to the existing condition.