

# **Executive Summary: Town of Hunts Point Proposed Shoreline Master Program Provisions for Piers and Bulkheads**

Standards for piers and docks and bulkheads in the proposed Hunts Point SMP are based on and incorporate provisions to recognize existing shoreline development and ecological functions, priorities of shoreline homeowners in Hunts Point, and established policies and measures to avoid further degradation of key shoreline ecological functions.

## **Pier Standards**

The proposed SMP includes regulations that provide specific dimensional and material guidance for new, replacement, and repaired piers and docks. These standards are summarized in the table below. These standards were derived from review of recently approved SMPs on Lakes Washington and Sammamish, guidance from the Department of Ecology, and from the scientific basis of the standards contained in the now-expired Corps Regional General Permit 3. As many points of flexibility as possible have been incorporated.

It is recognized that piers and docks may be proposed that extend beyond the dimensional standards established in the SMP, and that with sufficient mitigation, such projects may still meet the Ecology requirements to minimize impacts and attain the goal of “no net loss of ecological functions.” Since all proposed pier projects will be reviewed and evaluated for ecological impacts by the U.S. Army Corps of Engineers and the Washington Department of Fish and Wildlife, the proposed SMP includes a provision that the Town shall administratively approve a pier proposal that deviates from the dimensional standards of the SMP if it is approved by either of the above agencies. This approach provides maximum flexibility to shoreline property owners, while ensuring that shoreline functions are maintained on an individual and collective level.

If the flexibility built into the SMP for administrative approval by the Town is still not sufficient, applicants can pursue a Shoreline Variance.

*IMPORTANT NOTE: The SMP provisions for piers also contain a couple of departures from recently accepted standards based on direction from the Planning Commission/Town Council sub-committee. There has also been some additional customization of the pier regulations to recognize unique circumstances in Fairweather Basin/Haug Channel/Cozy Cove Inlet.*

## **Bulkhead Standards**

The majority of the standards for bulkhead modification are excerpted from the State’s SMP Guidelines. Regulatory provisions for shoreline stabilization in the proposed SMP require a demonstration of need for hard shoreline stabilization projects, and that non-structural or soft-structural approaches (e.g., using natural materials, including boulders, wood, and gravels) be used to the maximum extent *feasible*, limiting hard stabilization to only the areas necessary. Note: there is a very wide continuum between fully soft structural stabilization and hard structural stabilization. These standards are discussed below, and a table is provided to summarize the proposed bulkhead provisions.

Any new shoreline developments would need to be located and designed to avoid the need for shoreline modifications. New or enlarged bulkheads may be permitted if a geotechnical analysis indicates that the primary structure is in danger from shoreline erosion caused by waves, and: 1) there is a significant possibility that the structure will be damaged within three years without structural stabilization, 2) waiting will result in a lost opportunity to use measures that would avoid impacts on ecological functions; or 3) where the need is not as immediate as three years and soft structural stabilization measures are proposed to protect against erosion. *(Note: ~94% of Hunts Point's residential shoreline is protected by traditional or softer shoreline stabilization measures. The potential for new shoreline stabilization is very low, and new shoreline stabilization would be very difficult to permit at the state and federal level.)*

Hard structural stabilization may be used to replace existing hard structural stabilization provided that there is conclusive evidence that a primary structure is in danger from shoreline erosion. The regulations propose to exempt Fairweather Basin/Haug Channel/Cozy Cove Inlet from that requirement for providing demonstration of need.

In addition to mitigation measures that ensure that new or enlarged hard structural stabilization avoid degradation of ecological functions, any short-term impacts to ecological functions must be minimized and mitigated through compliance with timing restrictions, use of best management practices, and stabilization of exposed soils following construction.

In summary, bulkhead provisions included in the proposed Town of Hunts Point SMP are tailored to address a spectrum of possible conditions and site-specific needs. The provisions allow minor repairs or replacement of existing bulkheads with soft shoreline stabilization measures without any demonstration of need. The provisions also allow the replacement or new development of hard structural stabilization if there is a demonstrated need for the action.

*IMPORTANT NOTE: The SMP provisions for bulkheads also contain a couple of departures from recently accepted standards and State Guidelines based on direction from the Planning Commission/Town Council sub-committee. These departures primarily relate to unique circumstances in Fairweather Basin/Haug Channel/Cozy Cove Inlet.*

### Summary of Pier Standards by Project Type

	Repair*	Replacement**	New Pier
Maximum area	No larger than the greater of existing pier or new pier standards	Replacement of dock or of more than 75% of piles must meet new dock dimensional, decking, and design standards	<ul style="list-style-type: none"> <li>• 600 sq. ft. for single-family use</li> <li>• 700 sq. ft. for 2-party joint use</li> <li>• 1,000 sq. ft. for 3-party or more joint use</li> </ul>
Maximum Length	NA	<ul style="list-style-type: none"> <li>• Not to exceed 100 ft perpendicular from the shoreline on the Point</li> <li>• In Fairweather Basin, Haug Channel, and Cozy Cove Inlet - length not to exceed 1/5 of channel width and ells no longer than the greater of 30 feet or existing length</li> </ul>	
Maximum Width	NA	<ul style="list-style-type: none"> <li>• 4 ft. for the nearshore 30 feet of pier (or perpendicular portion of pier in the Basin/Channel/Inlet), 6 ft. for remainder of dock.</li> <li>• Provision allowing 6 feet in the nearshore if disability</li> </ul>	
Height of piers	NA	<ul style="list-style-type: none"> <li>• Minimum of 1.5 ft. above OHWM to bottom of pier stringers</li> <li>• Maximum of 4 ft. above OHWM for any piers or docks</li> </ul>	
Spacing	NA	Greater than 10 ft. or 10% of the lot width from the side yard property line, whichever is greater, except for joint-use piers	
Skirting	Existing skirting must be removed, no new or replacement skirting allowed		
Decking for piers, docks walkways, platform lifts, ells and fingers	Replacement decking must allow a minimum of 40% light transmittance if more than 25% of deck area	Piers, docks, and platform lifts must be fully grated, or allow a minimum of 40% light transmittance, except areas directly above float tubs	
Ells, fingers and floats	NA	Not allowed within 30 ft. of the OHWM, except in Fairweather Basin, Haug Channel, and Cozy Cove Inlet	
Pilings	For projects replacing 25-75% of piles, minimize size and maximize spacing	<ul style="list-style-type: none"> <li>• First set of pilings located no closer than 18 ft from OHWM, as feasible</li> <li>• Minimize size of the piles</li> <li>• Maximize spacing between pilings</li> </ul>	
Mitigation	NA	Mitigation planting at a 1:1 ratio with new or additional pier area; existing vegetation may count toward mitigation standards.	

\*Repair: Replacement of 75 percent or less of the pier support piles and/or less than 100% of the decking.

\*\*Replacement: When the entire existing structure is removed or when more than 75 percent of the pier-support piles are replaced. Pile replacement does not include piles that are repaired through sleeving or splicing.

**Summary of Bulkhead Standards by Project Type**

	<b>Minor Repair*</b>	<b>Repair/ Replacement of Soft Structure</b>	<b>Major Repair/ Replacement* of Hard Structure</b>	<b>New or Enlarged Bulkhead</b>
Assessment Required	No	Design to minimize impact	Demonstration of need (except in Basin/Channel/Inlet)	Geotechnical Report
Conditions	Allowed	Allowed	Structure shall not extend waterward of the OHWM or waterward of the existing structure	Structure shall not extend waterward of the OHWM, except as necessary to connect to the adjoining stabilization measures
			Limit size to the minimum necessary; shift hard stabilization structures landward and/or slope the structure landward to dissipate some wave energy	
			NA	<ul style="list-style-type: none"> <li>• Gravel fill waterward of OHWM</li> <li>• Mitigation planting, maintenance, and monitoring</li> </ul>

\*Major Repair/Replacement of a hard structure includes when the repair work involves modification of 50 percent or more of the length of the sheet pile, bottom course of rock, or footings; or when the repair work involves modification of more than 75 percent of the length of sheetpile, top or middle course of rocks or other similar repair activities. A Minor Repair does not meet the threshold of a Major Repair/Replacement.