

V. TECHNIQUES FOR LOCAL IMPLEMENTATION

This section of the LWRP sets out implementation strategies for the Town of Evans LWRP. This section considers existing laws and sections of Evans Town Code that relate to the Policies, as well as identifying proposed laws, amendments and other Town actions necessary to support the Policies. A management structure for implementation and consistency review is presented, along with an outline of the financial resources that may be necessary to implement the LWRP.

5.1 EXISTING LAWS

A. CHAPTER 64, BEACHES

Chapter 64 regulates the use of beaches along the Lake Erie shoreline in the Town of Evans. In accordance with Chapter 64, no person shall throw, deposit, carry or use any glass bottles or containers, whether empty or full, on or over any beach in the Town. The intent of this law is to protect the well-being and safety of citizens of the Town.

B. CHAPTER 95, PUBLIC ENTERTAINMENT; REFRESHMENT BUSINESSES

Chapter 95 requires the licensing of all amusements, live bands, refreshment businesses, restaurants and dance halls or other such establishments that allow dancing. Such licenses run for the calendar year and require annual renewal. This law also regulates the use, display or exhibition of fireworks. This license prohibits gambling of any kind or any disorderly, immoral, indecent or unlawful conduct or behavior.

C. CHAPTER 98, ENVIRONMENTAL QUALITY REVIEW

The intent of Chapter 98 is to implement, for the Town of Evans, the New York State Environmental Quality Review Act (SEQR) and Part 617 of the New York Code of Rules and Regulations, and to ensure that actions undertaken within the waterfront area are consistent with the policies and purposes of the Evans LWRP. Chapter 98 outlines the process required for SEQR and LWRP consistency review.

D. CHAPTER 101, EXCAVATIONS

Chapter 101 regulates the refilling of hazardous excavated lands and street excavations. Article I provides a means to require that the owners of excavated lands fill them or to authorize the Town to fill them in the event the owner fails to do so in an effort to remedy hazardous conditions. Article II regulates the manner in which excavations are made in or beneath streets, highways, roads, sidewalks, unimproved roads or public places in the Town.

E. CHAPTER 113, FLOOD DAMAGE PREVENTION

The purpose of Chapter 113 of the Town Code is to protect public health, safety, and welfare and minimize losses due to flood conditions in specific areas. In conformance with the requirements of the National Flood Insurance Program, and to qualify for participation in this program, this law outlines the standards for construction in areas of special flood hazard and restrictions on encroachments and other activities in designated floodways. The law also sets forth a process for obtaining a permit for this development in the floodplain. The entire LWRA shoreline is located within the regulated 100-year floodplain, as are the portions of Eighteen-Miles Creek, Pike Creek, Reisch Creek, Big Sister Creek, Little Sister Creek, Delaware Creek, Muddy Creek, and Fern Brook that fall within the LWRA.

F. CHAPTER 132, MARINA

The intent of Chapter 132 is to ensure the orderly operation of the Sturgeon Point

Marina and ensures the maximum public enjoyment of harbor facilities. Chapter 132 sets forth the dates for the seasonal operation of the marina and outlines the procedure and requirements for the issuance of permits for leasing of marina slips.

G. CHAPTER 142, PARKS

Chapter 142 regulates the use and operation of Town park facilities, setting hours of operation to control the use and preservation of these Town-owned properties and to prevent undue disturbance to residents and property owners situated adjacent to the parks. The after-hours use of Town park facilities requires prior approval of the Town Board.

H. CHAPTER 149, PROPERTY MAINTENANCE

This law recognizes the fact that junk vehicles, garbage and refuse that is abandoned or stored on private property, or unsafe and deteriorated structural or property conditions can constitute both a public and private nuisance and depreciates property values and community character. Therefore, Chapter 149 establishes basic and uniform property maintenance standards and a legal procedure for the removal of junk vehicles, debris and refuse, as required.

I. CHAPTER 151, PUBLIC IMPROVEMENTS

The intent of Chapter 151 is to regulate the construction of public improvements in the Town. Any work to be performed in relation to the installation and/or construction of any public improvements requires a permit. Permits are not issued until an applicant posts a surety bond in a sum equal to the work to be performed. Chapter 151 also outlines the requirements for the acceptance of working easements, where required.

J. CHAPTER 168, SOLID WASTE

Chapter 168 is the solid waste law of the Town. It regulates the separation, preparation, collection and disposal of municipal solid wastes and mandates recycling. Pursuant to Chapter 168, recyclable and non-recyclable waste from residential generators is collected and disposed of by private contractors authorized by the Town Board and must obtain a solid waste collection license from the Town Clerk.

K. CHAPTER 170, STORM SEWERS

Chapter 170 regulates non-stormwater discharges to the Town of Evans municipal storm sewer system (MS4) as required by federal and state law. Article I of this chapter establishes methods for controlling the introduction of pollutants into the system in order to comply with the requirements of the SPDES General Permit for MS4s. Chapter 170 prohibits illicit discharges and activities that would contaminate stormwater runoff, and requires the implementation of best management practices to control such discharges and activities.

L. CHAPTER 172, STREAMS AND WATERCOURSES

Pursuant to Chapter 172, no person, firm or corporation shall fill, divert or change or permit the filling, diversion or change of any stream or watercourse within the Town without a permit issued by the Town, unless authorized to do so by a State or Federal agency.

M. CHAPTER 178, SUBDIVISION OF LAND

Chapter 178 authorizes the Town Board to review and approve plats for the subdivision of land in conformance with the Town of Evans Zoning Code and Comprehensive Plan. The subdivision regulations set forth application/review procedures, plan specifications, design standards and required land improvements (road, drainage and utilities) for the minor and major subdivision of land in the Town. In addition to outlining the process for subdivision, Chapter 178 sets forth design standards for public improvements and preservation of trees and other natural features that add value to residential development and to the community, such as scenic vistas, historic sites, watercourses, beaches, woodlands and similar features.

N. CHAPTER 186, TOPSOIL AND DRAINAGE PROTECTION

The intent of Chapter 186 is to protect and preserve the natural beauty and value of property and to minimize public and private losses by regulating the removal, excavation or stripping of topsoil and alterations to topography within the Town. In accordance with Chapter 186, no person shall excavate, remove topsoil (including beach sand) or permanently alter topography for any reason other than the construction of an approved and permitted building or structure (or part thereof) or an appurtenant driveway or walkway, without a permit from the Code Enforcement Office.

O. CHAPTER 190, VEHICLES ABANDONED

The intent of this law is to help avoid, restrict and minimize damage or loss of wetlands in the Town, to ensure that wetlands are properly identified and that State and Federal requirements are met, and that additional design requirement for wetland impacts and mitigation are employed, as required.

P. CHAPTER 193, VEHICLES AND TRAFFIC

Chapter 193 sets forth general provisions for: the installation of traffic control devices, traffic regulations, parking provisions, and regulations for the use, removal, and storage of vehicles. Article VI of this chapter regulates the use of motor vehicles on any beach in the Town. The use of any automobile, motorcycle, motor scooter, mini-bike or any transportation device equipped with an

internal combustion engine or electric motor is prohibited on any real property owned or maintained by the Town as parklands or recreation lands. The use of any vehicle to launch or recover boats or to clean the beach is exempt from these provisions.

Q. CHAPTER 196, WATER

The purpose of Chapter 196 is to promote the general health, safety and welfare of the inhabitants of the Town through the regulation, supervision and control of the water system and supply of the Evans Water District. Receipt of water from or connection to the district requires approval from the Town Water Department. Chapter 196 regulates such things as fire hydrants, water meters, private service lines, tapping charges, and the installation of water facilities along new roads

R. CHAPTER 198, WIND ENERGY CONVERSION SYSTEMS

The Town recognizes that wind energy is an abundant, renewable and non-polluting energy resource and that its conversion to electricity can reduce dependence on non-renewable energy resources. Chapter 198 promotes the effective and efficient use of wind energy conversion systems and regulates the design, placement, construction, installation and/or modification of such systems for the purpose of protecting the health and safety of neighboring property owners and the general public, as well as the natural resources and aesthetics of the community. Upon the issuance of a Special Use Permit from the Town Board, wind energy conversion systems are restricted for commercial and residential use in certain zoning districts. The only zoning district in the LWRA where such a system would be permitted is the Agriculture and Open Space (AOS) district.

S. CHAPTER 200 – ZONING

Chapter 200 regulates and restricts (by district) the location, construction, and use of buildings and structures, and the use of land in the Town of Evans. The Zoning Code establishes districts, as well as uses and dimensional requirements for each district. This chapter of the Town Code also sets forth the procedures for obtaining special use permits, site plan review and zoning amendments. Chapter 200 outlines the duties and procedures of the Code Enforcement Officer and Zoning Board of Appeals. Overlay districts and Supplemental Regulations are also provided in the Zoning Code. The zoning districts found in the LWRA and their corresponding allowable uses are listed in more detail in Section II.

5.2 REVISIONS OF LOCAL LAWS NECESSARY TO IMPLEMENT THE LWRP

A. CONSISTENCY REVIEW LAW

Actions to be directly undertaken, funded or permitted within the local waterfront revitalization area must be consistent with the policies set forth in the Town of Evans LWRP. At present, consistency review is managed under Section 98-5 of the Environmental Quality Review Law. Through the adoption of a separate consistency review law, the Town can establish the legal framework required for the review of direct and indirect actions with the LWRP. This law shall be adopted as Chapter 98 of the Evans Town Code and will supersede and replace the existing Chapter 98 (See Appendix A).

B. ENVIRONMENTAL QUALITY REVIEW LAW

Chapter 98 should be rescinded, as the Part 617 regulations effectively regulate environmental quality review in the Town. As the Town currently follows these regulations, which are more up to date than the Town's law, there is no need for a separate, stand-alone Town law. This law will be superseded and replaced, as noted above.

C. ZONING

The Town of Evans regularly reviews and updates Chapter 200 as part of the implementation efforts for the Town of Evans 2010 Comprehensive Plan, and to keep the Code current and in line with local need and trends. To support the policies set forth in Section III and to implement the proposed actions presented in Section IV, certain zoning changes are recommended, including amendments to the existing zoning map (see Maps [9A](#) , [9B](#), and [9C](#), and Appendix D).

The Proposed Zoning maps identify the recommended zoning scheme to better guide development in a manner that protects the character of the community and encourages water-related uses along the waterfront. Several of the key map changes recommended are described below.

Sub-Area 1

The Joel Harvey fishing access site is currently zoned for multi-family residential use (MFR-3). This site is an active recreational facility and should be rezoned as such. The adjoining parcel is owned by Erie County and is also zoned for multi-family residential use. This site should be rezoned to Public Facility (PF).

Sub-Area 2

The Purvis Landing parcel is zoned Residential Two-Family (R-2). This site should be rezoned to Recreational Facility (RF).

Sub-Area 3

With the exception of the Lake Erie Beach business district and the private beach clubs, which are zoned Neighborhood Business, all of Sub-area 3 is located in one of three single-family residential zoning districts. No changes are proposed for to the zoning map in Sub-area 3.

5.3 OTHER PUBLIC AND PRIVATE ACTIONS NECESSARY TO IMPLEMENT THE LWRP

FRANK LLOYD WRIGHT GRAYCLIFF ESTATE

Built between 1926 and 1929, the Graycliff estate was designed by the renowned American architect Frank Lloyd Wright for Isabelle R. Martin and her husband, Larkin Company executive Darwin D. Martin. Graycliff served as the Martin summer home from 1927 to the mid-1940s. Graycliff was designated a New York State Landmark in 1998 and is an important and world-renowned historic and architectural

resource. The Graycliff Conservancy, Inc. is a not-for-profit organization dedicated to restoring and preserving the estate as a publicly accessible landmark. The Conservancy has been overseeing a series of restoration efforts that began in 1998 to restore this resource to its original character and design. Current plans include increasing readiness for tourism, completion of restoration of building interiors, installation of a state-of-the-art fire suppression system, restoration of the historic landscape and restoration of the stair tower to the beach.

BIG SISTER CREEK FLOOD IMPROVEMENTS

The Town has long sought to address the flooding problems that occur along Big Sister Creek at NYS Route 5. This area is subject to flooding impacts from ice jamming that occurs each year. Flooding in this area forces the closing of Route 5 and has resulted in tens of thousands of dollars in damage to surrounding properties, including the Town of Evans Historical Society. It has displaced residents, disrupted business and caused roadway damage to NYS Route 5 and Bennett Road. The Town desires funding to properly examine and mitigate flooding in this area to improve public safety and prevent future losses.

COASTAL EROSION MAP UPDATES

Waterfront lands that generally extend seaward of Lake Shore Road are included within the State-designated Coastal Erosion Hazard Area (CEHA). However, portions of this area are not clearly defined, leading to ambiguous determinations and difficulty in properly protecting resources (Maps 7A, 7B, and 7C in Section II). In particular, the area in the vicinity of Bennett Road and Big Sister Creek, including Bennett Beach, does not appear to be effectively protected. The lack of clarity on these maps has led to the development of areas of primary dune that should be protected. The Evans waterfront area contains floodplain, primary dune formations and large stands of old growth forest that fall outside of the protection of the CEHA boundary. Therefore, the CEHA boundary maps for the Town need to be thoroughly reviewed and amended by the NYSDEC to adequately protect important natural protective features and other natural resources along the waterfront.

COUNTY WASTEWATER SYSTEM IMPROVEMENTS

Erie County Sewer District No. 2 is experiencing inflow and infiltration problems in certain areas in the Town. The pumping stations in the Lake Erie Beach and Lake Street areas were upgraded in 2009, and continued upgrades are planned in 2010 in connection with the County's force main improvement project to resolve some of the problems. However, upgrades are still needed at the Sweetland Road Pump Station. Capacity needs at this location are still being studied and necessary improvements will be undertaken when County-funding becomes available.

COUNTY PARK IMPROVEMENTS

Bennett Beach

Bennett Beach is a passive park that offers no formalized play fields or courts. It primarily consists of about 50 acres of beachfront, dunes and woodlands with limited facilities for the public. It is bisected by Lake Shore Road and by Big Sister Creek, which outlets to Lake Erie at the beach. Park facilities include a

comfort station, picnic area and parking lot. This park is the site of the historic Bennett estate and homestead, which offered camping and water related recreation for many years. This park still retains some of the historic landscape features that were once common along the Evans lakeshore, including a sand beach and one of the only areas of natural sand dunes on Lake Erie. Currently, the Town assists the County with maintenance and park operations.

The Erie County Parks Master Plan outlines a number of recommendations for this park (Appendix A, which includes excerpts from the plan). The Erie County Parks Master Plan sets forth two potential development or redevelopment scenarios for Bennett Beach. One scheme is based on a future acquisition of the former Angola Water Treatment Plant (see below), wherein the building would be either refurbished or reconstructed to offer restrooms, changing rooms, concessions/restaurant, a lifeguard station, outdoor patio space for scenic viewing and/or possible lodging facilities. The beach area and dunes would be protected and educational/interpretive information could be provided to tell the story of the natural shoreline conditions of Lake Erie. Meeting rooms could also be included in the structure for environmental education classes or/and on-site laboratory. The backshore area could be improved with volleyball courts and other beach related activities. The beach house could also offer kayaks or wind surfing equipment rentals.

A second scenario, which does not include the water treatment plant, recommends the construction of a new restroom facility to be strategically located between the beach and the parking area. Park patrons could proceed to the beach going past or through this facility. It would be similar to the beach/bath house that exists at Woodlawn Beach State Park and offer restrooms, changing rooms, first aid, lifeguard, concessions, lockers and a patio for scenic viewing. Under this scenario, a secondary shelter could be built on the bridge that crosses Big Sister Creek to provide an area for respite. Here again, interpretive and educational information could be included long the boardwalk and/or in the beach house to tell the story of the natural shoreline conditions of Lake Erie. Meeting rooms could also be included.

Under either scenario, a handicapped accessible boardwalk system would be constructed to connect with the bridge and extend through the existing “cut” in the natural sand dune to keep park patrons off/out of the dunes as they proceed to the beach and reduce further impacts and degradation. This new boardwalk would allow for the reinstatement and restoration of the dune with beach grasses and native vegetation that would prevent further water erosion and debris build-up following major storms along the lake. Other recommendations include improvements to the parking area, relocation of the site entrance to make ingress and egress at the park safer, maintenance of the woodlands (east of Lake Shore Road) as a preserve with interpretive trails and signage, increased/enhanced fishing access to Big Sister Creek, reduced lawn mowing, new native tree and indigenous plantings, and the establishment of a stronger connection between the park and the community.

The Town supports the recommendations to protect the dunes and make minor improvements for parking and street access. However, the environmental and archaeological significance of the park, as noted below, warrants a strategy that protects these resources and reduces public intrusion. The Town does not endorse any actions that would adversely impact sensitive resources or any recommendations

in the Erie County Parks Master Plan that might result in damage to or deterioration of the dunes. Therefore, some of the recommendations offered in the Plan are not supported by the LWRP. Collaboration or partnership with corporate or private interests is also recommended to enable necessary park improvements.

The sand dune formations and associated forest habitat at Bennett Beach County Park have long been recognized as a significant ecological resource. This area has been listed in the New York State Open Space Conservation Plan as one of top 10 priority sites for open space acquisition in Region 9. The approximately eight acres of dunes at Bennett Beach are associated with important old-growth hemlock forest, making this area particularly unique. It is one of only two sites in the world where such old-growth trees grow on sand dunes (the other site is Sleeping Bear National Park in Michigan). Furthermore, this is the only site with lake dunes in New York State. The ecosystem in this area of the waterfront is further enhanced by Big Sister Creek, which extends northward, creating a peninsula with dunes and sandy beach (see Appendix C). The importance of this area cannot be understated and the acquisition of remaining private portions of this area for open space is recommended.

The general area of dunes and forest has been impacted over years by residential development and public use. This habitat area falls within the County Park and extends onto private residential properties immediately surrounding the park. The habitat area that extends onto private property is more difficult to protect without regulatory mechanisms to ensure that potential development actions do not destroy or other result in adverse impacts to these resources.

The sand dune formations at Bennett Beach County Park, in Sub Area 2, are not only recognized as a significant ecological resource, they are archaeologically significant. In 1991, this area was investigated by the State University of New York at Buffalo and determined to be an important prehistoric archaeological site. It was recorded as Site UB 2617 in the archaeological files of the Department of Anthropology. It was also reported to the State Office of Parks, Recreation and Historic Preservation. Further studies were conducted by the University in 1993, 1997, 2002 and 2003, expanding the area of investigation to include the area of the Bennett Bridge (UB2914) and the Bennett House Sites (UB 2623). The findings were documented in a June 2003 report entitled "A Preliminary Description of the Bennett Beach (UB 2617), Bennett Bridge (UB2914) and Bennett House Site (UB 2623), excerpts of which are included in Appendix B.

The information documented by the University noted that the site was repeatedly occupied by native populations of western New York throughout the last 2,500 to 3,000 years. Inspection of the site indicated that intact archaeological deposits, including prehistoric living surfaces, hearths and pits are well preserved within the sand dunes and are likely to be preserved within the ground in other portions of the property. As recommended by the University, a thorough survey of the Bennett Beach area should be conducted by a qualified professional archaeologist to further document the resources in this area in an effort to protect and preserve them as irreplaceable cultural resources.

In light of the ecological and archaeological importance of the Bennett Beach and Pine Lodge areas, the Town should designate this portion of the waterfront as a Critical Environmental Area. Disturbance of

any nature to the dunes and vegetation should be strictly prohibited. No building construction should occur on the beach that could potentially impact cultural resources and artifacts in the area. This portion of the waterfront must be recognized and protected. Consideration should also be given to capitalizing on the educational and interpretive characteristics of this area.

Furthermore, the dune and forest resources in the Bennett Beach area are also very beautiful and provide extensive opportunities for scenic viewing. This aspect should be recognized as a part of the value of this area. New York State Division of Coastal Resources has developed a scenic assessment program that identifies the scenic qualities of coastal landscapes, evaluates them against criteria to determine their aesthetic significance and recommends areas for designation as Scenic Areas of Statewide Significance (SASS). SASS designation protects scenic landscapes through the review of projects that require state or federal permitting, funding or approval. The Bennett Beach area may be a candidate for such a designation in consideration of the geologic and ecological resources that exist in this area. The Town should work with the State to pursue such a designation. Consideration should be given to other similar areas of importance that could be assembled as a Lake Erie SASS.

In general, the resource value of the dunes at Bennett Beach, as well as the dunes and vegetation in the Pine Lodge area to the north, requires protective action. The Town needs to work with the County and State to determine effective ways to preserve the resources in this area of the waterfront. This area needs to be permanently identified in the New York State Open Space Conservation Plan for acquisition as an old growth forest resource. Public access to the dunes in the County Park needs to be restricted and the ecological resource value of the area, as a whole, needs to be better understood and appreciated. Only this will lead to the development of effective measures and safeguards to protect the valuable cultural and ecological resources in this area. Furthermore, it is recommended that the Erie County Parks Department consider updating the portion of the Erie County Parks Master Plan that addresses Bennett Beach to reflect significant need to protect the resources in this park. In light of what we now know about the significance of the dunes and other natural resources in this area, the County's plan needs to be revised to omit certain recommendations that suggest physical improvements to this area. Actions are needed to prevent the public from physically accessing the dunes, and to educate park patrons on the significance of the resources that exist in the area and the importance of protecting them from degradation.

Wendt Beach

Wendt Beach is a 178-acre, multi-purpose park that is owned by Erie County. It offers both beach related and passive activities along the shoreline and active field sports on an expanse of mowed open lawns. There is also a large forested wetland that is associated with a tributary stream that flows through the park. There is also a continuous bluff that stands about 15 feet high along the entire inland edge of the beach.

Wendt Beach Park includes the historic Wendt Mansion, which is currently vacant. This structure is part of the remains of the former Wendt family estate (Ridgewood) and is subjected to vandalism that is threatening its integrity. It was built in the mid 1800's atop the dune overlooking Lake Erie. There are

other, smaller outbuildings that remain, including a log cabin (former guest house), a caretaker's cottage, garage with chauffeur's quarters and a horse stable (which was converted to public restrooms).

The Erie County Parks Master Plan outlines a number of recommendations for this park (Appendix A). As noted above, this site is part of a very important heritage area and the Wendt Mansion needs to be restored. Appropriate ways for adaptive re-use of this facility need might include a bed and breakfast inn, similar to the Glen Iris Inn at Letchworth State Park. Public/private partnerships should be considered as a means for restoration and reuse of the mansion. As with Bennett Beach, the Town of Evans currently assists the County with maintenance and park operations. In general, it is recommended that the Erie County Parks Department consider updating the portion of the Erie County Parks Master Plan that addresses Wendt Beach to reflect needed improvements to this park and the County's position on the re-use of the Wendt Mansion.

ANGOLA WATER TREATMENT PLANT

The Angola Water Treatment Plant was used to process public water supply for the Town of Evans and Village of Angola. The plant was closed in the mid 1990's, after the Village of Angola contracted with Erie County for the bulk purchase of drinking water. This plant is situated at a prominent location along the waterfront and is owned by the Village of Angola. This site has the potential to be reused for greater public benefit. Its proximity to Bennett Beach, the availability of scenic views and other assets of this location offer opportunities for improved public access, tourism and economic development. Therefore, the facility could be re-established for lodging, limited entertainment or some other public use or public/private commercial enterprise.

EVANGOLA STATE PARK IMPROVEMENTS

Evangola State Park is located at the southern end of the shoreline. Although much of the park is located in the adjoining Town of Brant, portions extend into Evans. This State park needs general maintenance and programming improvements to provide greater benefit to the general public.

5.4 MANAGEMENT STRUCTURE FOR IMPLEMENTING THE LWRP

All State and Federal actions proposed within the Town of Evans waterfront area shall be reviewed in accordance with the guidelines established by the New York State Department of State. The review of proposed actions for consistency with the policies and provisions of the Town of Evans LWRP, including site plan and subdivision applications, is currently undertaken by the Evans Code Enforcement Officer, in collaboration with the Planning Division. Any action that is proposed within the LWRA, and is subject to the Local Waterfront Revitalization Program Consistency Review Law, requires completion of a Waterfront Assessment Form (the Consistency Review Law and Waterfront Assessment Form are contained in Appendix A. For more guidelines, see Appendix H.

5.5 FINANCIAL RESOURCES NECESSARY TO IMPLEMENT THE LWRP

It is recognized that the implementation of the proposed projects identified under Section IV will require funding from a combination of public and private sources. These costs may include capital outlays, maintenance costs and, in some cases, property acquisition. The costs for these projects are undetermined at this time. Where applicable, the Town will work diligently to secure funding through grants available through State and Federal program funds to support the implementation of the identified LWRP projects.

Private residential and commercial revitalization efforts are expected to continue in the Lake Erie Beach community, in the Sturgeon Point area and in other areas along the waterfront. The Town endorses these efforts and will ensure that they are undertaken in a manner consistent with the policies of the LWRP.