

memorandum

date June 30, 2011

to Robert Maul, Community Development Director, City of Battle Ground

from Reema Shakra, Teresa Vanderburg, and Ikuno Masterson, ESA

subject Shoreline Master Program Update, Draft No Net Loss Summary – City of Battle Ground

Introduction

The purpose of this memo is to document how City of Battle Ground Draft Shoreline Master Program (SMP) achieves “no net loss” of shoreline ecological functions. This summary is based on the conclusions of the City of Battle Ground Cumulative Impacts Analysis which was an assessment of the following:

- The analysis of baseline conditions from the Clark County Coalition Inventory and Characterization Report (June 2010);
- The goals, policies, and regulations of the SMP; together with
- The proposed measures in the Clark County Coalition Shoreline Restoration Plan.

The integration of the overall SMP was evaluated to assess how ecological functions for shorelines in the city of Battle Ground and its urban growth area might be expected to perform as development occurs over the next twenty years.

The concept of no net loss of shoreline ecological functions has been rooted in the Shoreline Management Act since its enactment by the citizens of the state of Washington in 1971. The Act states that “permitted uses in the shoreline shall be designed and conducted in a manner that minimizes in so far as practical, any resultant damage to the ecology and environment of the shoreline area...” (WAC 173-26-176[2]). The concept was translated into the goals, policies, and governing principles of Ecology’s guidelines for updating local government SMPs. The guidelines suggest that “no net loss” is achieved primarily through regulatory mechanisms including mitigation requirements but that restoration incentives and voluntary actions are also critical to achieving the “no net loss” goal.

City Shorelines

Two shorelines of the state are located within the city limits and urban growth area (UGA) of Battle Ground: Salmon Creek and Morgan Creek. There are a total of 2.6 linear stream miles in Battle Ground.

Salmon Creek extends for 2.0 miles through Battle Ground and its UGA, and contains approximately 113 acres of floodplain and stream habitat. Much of the reach has been altered by human development including the construction of several railroad crossings, recreational developments (primarily golf courses), and the conversion of floodplains to agriculture lands. These activities have removed much of the native vegetation, decreased water quality, increased stream sedimentation, and generally degraded salmon habitat.

Morgan Creek extends for 0.6 miles through Battle Ground's UGA, and contains approximately 24 acres of associated floodplain and habitat. Portions of the shoreline have been cleared of native vegetation and are confined by a roadway that parallels the channel. These activities have reduced riparian habitat, increased sedimentation and runoff, and have interrupted natural channel floodplain interactions.

Ecological Functions

Based on the findings of the Clark County Shoreline Inventory and Characterization (ICR) (ESA Adolphson, 2010), ecological functions most at risk as a result of future development in Battle Ground shorelines include:

- Riparian habitat;
- Floodplain connectivity;
- Salmonid habitat;
- Water quality and quantity; and
- Associated wetlands.

Reasonably Foreseeable Future Development

There are nearly 131 acres of shoreline area in Battle Ground and its UGA. All vacant lands are zoned for residential development, with a potential for 34 residential units over the next 20 years. The number of future potential residential units is higher than would likely occur. The purpose of overestimating development on vacant lands in this manner is to determine impact on ecological functions under a worst-case scenario.

Cumulative Impacts Assessment

A cumulative impacts assessment was developed on a Clark County Coalition Draft SMP in March 2011. A preliminary finding of potential net loss was determined. In response, the Coalition staff, with input from citizens and advised by the Shoreline Stakeholder Advisory Committee, Technical Advisory Committee and Independent Science Review Panel, re-examined and changed several of the designations placed on specific shoreline reaches, revised regulations associated with specific use allowances, dimensional standards, such as structure setbacks, and vegetation conservation provisions.

The City changed areas with the Medium Intensity shoreline designation to Urban Conservancy for additional protections and adjusted accessory parking and building setbacks in the Urban Conservancy from 50 feet to 100 feet. These revisions were incorporated into the City of Battle Ground Draft SMP (June, 2011). The Clark County Coalition Draft Cumulative Impact Analysis (June, 2011) provides additional detail as to which regulations in the Final Draft SMP serve to protect ecological functions and processes. The assessment of future performance in the last column of the WRIA 28 tables in Appendix A are also applicable to the waterbodies in and around Battle Ground.

No cumulative impacts on shoreline ecological functions are anticipated as a result of the City's proposed program (City of Battle Ground Cumulative Impacts Analysis and the Clark County Coalition Draft Cumulative Impacts Analysis June, 2011).

Draft Conclusion

The baseline conditions of ecological functions and processes in the Clark County ICR were used as the basis for decisions made throughout the City's SMP update process. The inventory was integral to the development of the shoreline designations, informed goal and policy development, led to the establishment of protective regulations in the City Draft SMP, and shaped the conclusions of the cumulative impact analysis.

Based on the anticipated low levels of foreseeable future development in Battle Ground's shorelines and the collective protective and restorative measures of the City Draft SMP, Clark County Coalition Restoration Plan, and the plans, programs, regulations and projects in place to protect ecological functions, net loss of shoreline ecological functions from existing baseline conditions is not anticipated.

Both Salmon Creek and Morgan Creek are designated Urban Conservancy with standard structure setbacks and critical area buffers in place. Priority and commitment to enforcing the Draft SMP provisions for proposals that are exempt from shoreline permits, particularly with regard to vegetation conservation standards will help to ensure that a conclusion of "no net loss" of shoreline function can be maintained. Increasing the water-related and water-enjoyment recreational uses and development setback of 20 feet in the Urban Conservancy shoreline designation will help reduce interruption to hydrologic and habitat functions. A commitment to restoration of degraded shorelines citywide is encouraged to continue the trend of improvement of shoreline ecological functions into the future.