

memorandum

date June 30, 2011

to Dale Miller, City of La Center

from Reema Shakra, Teresa Vanderburg, Ikuno Masterson, ESA

subject Shoreline Master Program Update, Draft No Net Loss Summary – City of La Center

Introduction

The purpose of this memo is to demonstrate how the City of La Center Draft Shoreline Master Program (SMP) achieves “no net loss” of shoreline ecological functions. This summary is based on the conclusions of the City of La Center 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 La Center 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

One shoreline of the state is located within La Center city limits and urban growth area, the East Fork Lewis River.

The East Fork Lewis River extends for 0.1 miles through the city of La Center and its urban growth area, and contains approximately 42 acres in the shoreline jurisdiction. Modifications to the East Fork Lewis River in this area include the clearing and conversion of riparian habitat to residential developments, roadways, bridge crossings, or other impervious surfaces. As a result of clearing and development activities native vegetation and riparian habitat has been significantly reduced and stormwater and sediment runoff has increased.

Ecological Functions

Based on the findings of the Clark County Shoreline Inventory and Characterization (ICR) (ESA Adolfson, 2010), ecological functions most at risk as a result of future development in La Center's shoreline include:

- Riparian habitat;
- Shoreline stability;
- Salmon habitat;
- Water quality and quantity; and
- River/floodplain connectivity.

Reasonably Foreseeable Future Development

There are about 80 acres of shoreline area in La Center and its UGA. The majority of vacant land is zoned for residential and commercial development, with a potential for an additional 38 units over the next twenty years. The number of future residential units is likely higher than would occur. The purpose of over-estimating development on vacant lands in this manner is to determine impact on ecological functions under a worst-case scenario.

Cumulative Impacts Assessment

A cumulative impact assessment was conducted on the 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.

The City changed some areas designated as Medium Intensity to Urban Conservancy for additional protections to shoreline resources and adjusted accessory parking and structure setbacks in the Urban Conservancy shoreline designation. These revisions were incorporated into the City of La Center 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 27 table in Appendix A for the East Fork is also applicable.

No cumulative impacts on shoreline ecological functions are anticipated as a result of the City's proposed program (City of La Center Draft Cumulative Impacts Analysis and the Clark County

Coalition Draft Cumulative Impacts Analysis, June, 2011). The East Fork Lewis River is a priority for salmon recovery and is designated both Urban Conservancy and High Intensity. Increasing the water-related and water-enjoyment recreational uses and development setback of 20 feet in the Urban Conservancy shoreline designation will help reduce the potential for interruption to hydrologic and habitat functions.

Draft Conclusions

The baseline conditions of ecological functions and processes in the Clark County Coalition 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, and shaped the conclusions of the cumulative impact analysis.

Based on the anticipated low levels of foreseeable future development in the City 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.

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. Over 60 percent of the lands within La Center's shoreline are publicly held. To continue the trend of improvement of shoreline ecological functions into the future, a commitment to restoration of degraded shorelines citywide is encouraged to showcase regional priorities