

## Responsiveness Summary: City of Woodland Locally Adopted Shoreline Master Program (SMP)

Ecology Public Comment Period: September 1, 2015 through 5:00 pm on October 1, 2015

Comment Number	Comment Topic and/or SMP Citation	Commenter(s)	Comment (Summary)	Local Government Response and Rationale	State Response and Rationale
1.	SMP in general	Consolidated Diking Improvement District No. 2 of Cowlitz County (CDID No. 2)	CDID No. 2 believes that the Shoreline Master Program places the existing flood protection works in a position of being a nonconforming use, thereby hampering CDID No. 2's ability to maintain the system and limiting future improvements to the levee system.		
2.	Vegetation control requirements	CDID No. 2	CDID No. 2 is required to operate and maintain the levee in accordance with the US Army Corps of Engineers' (USACE) standards. These standards require the removal of all vegetation except for grass within 15 feet of the flood protection works. This is in direct violation of the proposed Shoreline Master Program vegetation conservation requirements.		
3.	Public access	CDID No. 2	CDID No. 2's ability to provide public access to the shoreline is limited by its need to meet the USACE's maintenance requirements. Public access can cause erosion trails down the face of the levee degrading its structural stability.		
4.	Public access	CDID No. 2	Portions of the flood protection system are located on easements that were acquired for diking purposes only. If public access was required for a CDID No. 2 diking project where the dike is located on an easement, CDID No. 2 would be required to acquire a public access easement or fee title from the property owner.		
5.	Design standards	CDID No. 2	Vegetation conservation and no net loss of ecological function standards will be difficult, if not impossible, to achieve if CDID No.2 is to meet USACE standards when flood protection works are modified or expanded.		
6.	Design standards	CDID No. 2	Maximum design height will be difficult and potentially costly to comply with because river modeling is not an exact science. For example as data is collected and models are refined, what was originally modeled as a 100-year event may be revised to a 90-year event, which increases the height required for flood protection works. CDID No.2 is required by FEMA to maintain a minimum flood protection level of 100-years or flood insurance requirements go into effect. The 100-year flood level and flood protection height must be verified when the system is recertified. If held to a maximum height, CDID No. 2 could be required to raise the flood protection works at every recertification increasing the cost and disturbances to the ecosystem.		