CITY OF LA CENTER
SHORELINE MASTER PROGRAM UPDATE
City of La Center
Cumulative Impacts Analysis

Prepared for
City of La Center
December 2012
1.0 INTRODUCTION

The intent of this document is to summarize the evaluation of potential cumulative impacts to shoreline ecological functions that may occur as a result of implementing the City of La Center Draft Shoreline Master Program (SMP) as it is currently proposed. This summary is based on the Clark County Coalition Draft Cumulative Impact Analysis (Coalition Analysis), dated February 2012 and the provisions outlined in the City of La Center SMP locally-adopted on September 26, 2012.

This report first introduces the shorelines of the state that are located in La Center and its Urban Growth Area (UGA). Based on existing conditions, as documented in the Clark County Coalition Shoreline Inventory and Characterization Report (Coalition ICR) (ESA Adolfson, 2010), the ecological functions most at risk are identified. As part of this analysis “reasonable foreseeable development” is projected for La Center and its UGA using assumptions from the Coalition Analysis. The conclusion discusses potential cumulative impacts, if any, of the City’s Draft SMP on shoreline ecological functions.

2.0 INVENTORY AND CHARACTERIZATION

The Coalition ICR (ESA Adolfson, 2010) identifies existing conditions and evaluates the ecological functions and processes in the City’s shoreline jurisdiction. The inventory includes all shoreline areas within the City of La Center and its designated UGA.

2.1 Shorelines of the State

One shoreline of the state, the East Fork Lewis River, runs through the city limits and UGA.

2.2 Ecological Functions

Based on the findings of the Coalition ICR (ESA Adolfson, 2010), ecological functions most at risk due to land disturbing activities in the City’s shoreline include:

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

2.3 Management Recommendations

During the development of the Coalition ICR, an initial set of general management recommendations were generated in response to the findings about shoreline functions for each of the SMA waterbodies in the County. These management recommendations provided guidance to the Coalition as they moved forward in their SMP update process of goals, policies,
and regulations. For La Center, these general recommendations for the City’s shoreline are summarized below. For additional discussion and detail please refer to the Coalition ICR.

2.3.1 Vegetation Management

- Riparian areas and vegetation conservation zones should be restored to remove non-native and invasive plant species. Native trees and shrubs should then be planted. Salmon habitat is supported by riparian zones that contain native trees and shrubs, which provide food sources, shading and large woody debris to lakes, rivers and streams.

- Vegetation conservation measures and setbacks and buffers from the ordinary high water mark should be required for all future development along shorelines.

- Prevent the introduction of non-native invasive species and encourage rapid eradication. Develop an invasive plant inventory to track changes and prioritize areas for eradication.

2.3.2 Program Considerations

- Regulatory language should be written in a manner that is easy to understand and provides options for compliance.

- Consider improving the shoreline permitting process to ensure adequate review of impacts, public noticing, compliance with regulations and agency coordination.

- Consider developing an inventory of archaeological sites that contribute to the history and understanding of past human activities in Clark County.

2.3.3 Development Regulations – Hard Armoring

- Consider regulations that encourage and facilitate levee setback projects (e.g., pulling back an existing levee to allow for a larger floodplain area contiguous to a waterbody) and other shoreline enhancement projects.

- Consider requirements for soft-shore bioengineering techniques where new armoring or retrofits cannot be avoided.

- Consider alternatives to new armoring such as setbacks and vegetated riparian zones. New developments should be located on the property in such a manner as to not require shoreline armoring in order to protect the house and other structures.
2.3.4 Development Regulations – Overwater Structures

- Consider size limitations for overwater structures, including new docks, piers or floats.
- Consider joint-use docks prior to construction of single-use residential docks to minimize dock proliferation and shading impacts.

2.3.5 Development Regulations – Mitigation

- Consider requirements for new development to provide an analysis during permit approval of existing and newly proposed impacts to the site-specific ecological functions and values in order to focus and improve the effectiveness of any required mitigation.
- Require mitigation sequencing as per the shoreline guidelines. Project designs should demonstrate avoidance and minimization, prior to compensatory mitigation or replacement of functions.
- The goal of mitigation is no net loss of shoreline ecological functions from the baseline condition established in the ICR.
- Consider requiring public access that is commensurate with the scale and character of future development and avoids adverse effects on the natural shoreline character and functions.

2.4 Shoreline Use Analysis

Existing uses along the East Fork Lewis River in La Center are vacant lands, single-family residential and open space. Large portions of the East Fork Lewis River floodplain are publicly owned but occur just outside the City’s UGA and city limits. NW LA Center Road crosses the East Fork Lewis River near the confluence with Brezee Creek. The shoreline area is located to the northeast of the La Center Junction sub-area, which is targeted for commercial and industrial development.

3.0 SHORELINE ENVIRONMENT DESIGNATION

Shoreline Designations (SDs) were developed based on a review of Coalition ICR, biological and physical characteristics of the shoreline, existing development patterns, and goals and aspirations of the community as expressed through the City’s Comprehensive Plan. The City was also directed by the definitions in Washington State’s Shoreline Guidelines (WAC 173-26-211). The specific methodology by which the designations were established is described in the Coalition Analysis as well as the Shoreline Designation Rationale Memo, Appendix B of the City’s Draft SMP.

The three designations that are proposed in the Draft SMP include the following:
1. **Aquatic** – The purpose of this designation is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high water mark (OHWM). This designation is applied to all lands waterward of the OHWM.

2. **Urban Conservancy** – The purpose of this designation is to protect and restore ecological functions of open space, floodplains, and other sensitive lands, where they exist alongside urban and developed settings, while allowing a variety of compatible uses. This designation is concentrated within city limits on the westernmost portion of the East Fork Lewis River and along the river to the east of NW La Center Road. The designation can also be found in the UGA to the west of City limits.

3. **Medium Intensity** – The purpose of this designation is to accommodate primarily residential development and appurtenant structures, but to also allow other types of development that are consistent with the SMP. An additional purpose is to provide appropriate public access and recreational uses. This designation is concentrated along the East Fork Lewis River within the city limits, west of NW La Center Road. This SED was formerly considered High Intensity in earlier versions of the SMP but has been revised to Medium Intensity to better describe the nature of proposed land uses.

### 4.0 SHORELINE MASTER PROGRAM

#### 4.1 Goals and Policies

The La Center Draft SMP has goal statements and policies for general and specific shoreline developments, modifications and uses (see Chapter 3 of the Draft SMP). Goals and policies were developed based on the state’s shoreline guidelines, the Coalition ICR, Clark County Coalition SMP Update Management Strategy, input from the general public, and the City’s Comprehensive Plan. New policies were developed that are unique to the Draft SMP. Policies that were included based on the Coalition ICR are intended to address the management recommendations and to ensure no net loss from baseline conditions.

#### 4.2 Regulations

The Draft SMP establishes regulations for general and specific shoreline developments, modifications and uses. The regulations are generally designed to improve protection of shoreline ecological functions and management of the resources identified in the Coalition ICR. Protective regulations in the draft SMP include, but are not limited to:

**4.2.1 Critical Areas**

- The critical area regulations from La Center Municipal Code 18.300 have been adopted by reference, appended to the Draft SMP (see Appendix C), and are regulated in accordance with standards in Draft SMP Chapter V, Section C.

- Reasonable use exceptions must be processed as a shoreline variance;
• If shoreline critical area impacts cannot be avoided, then mitigation must occur consistent with mitigation sequencing standards.

4.2.2 Water Quality

• New development must meet current stormwater management standards;

• BMPs must be used to control treatment and release of surface runoff, erosion control methods must be used during construction and operation;

• If appropriate, low-impact development approaches should be implemented to the maximum extent feasible;

• Other regulations prohibit the use of herbicides, fungicides, fertilizers, and pesticides within 25 feet of a waterbody, except by a qualified professional in accordance with state and federal laws.

• In-water structures must be constructed of materials that will not adversely affect water quality or aquatic plants and animals over the long term.

4.2.3 Vegetation Conservation

• Existing native vegetation must be retained and removal avoided. Where removal of native vegetation cannot be avoided, it must be minimized to protect ecological functions.

• Mitigation requirements for removal of vegetation must be determined after review of a habitat management plan that assesses the cumulative impacts associated with removing riparian vegetation.

• Topping trees is prohibited and pruning is only allowed in limited amounts.

• Habitat that cannot be replaced or restored within 20 years must be preserved.

• When restoring or enhancing vegetation, native species must be used.

4.2.4 Structural Shoreline Stabilization

• New hard armoring must obtain a conditional use permit and prove that soft-shore stabilization is not feasible.

• Naturally regenerating systems for the prevention and control of shoreline erosion must be used instead of structural solutions where (1) the length and configuration of shoreline will accommodate such systems; (2) such protection is a reasonable solution to the needs of the specific site; and (3) the project will achieve one or more of the following:

  • Recreate or enhance natural shoreline conditions;

  • Create or enhance natural habitat;
• Reverse otherwise erosional conditions; or
• Enhance access to the shoreline, especially to public shorelines.

5.0 RESTORATION PLAN

A Clark County Coalition Draft Shoreline Restoration Plan was developed as part of the SMP update process (ESA Adolfson, 2011). Restoration opportunities were identified for the East Fork Lewis River within the City and UGA and are summarized below.

Restoration opportunities that would be implemented at a programmatic level include the following:

• Improve hydrology by restoring stream connectivity to off-channel and floodplain habitats, removing or setting back dikes and levees, and managing withdrawals to provide for adequate in-stream flows;
• Protect water quality by restricting livestock access, removing or replacing failing septic systems, and controlling agricultural runoff;
• Restore riparian forests;
• Control invasive riparian vegetation;
• Enhance and restore degraded wetland habitats;
• Restore fish habitat, remove or repair failing culverts, and supplement large woody debris; and
• Improve stormwater facilities and management strategies.

The site-specific restoration opportunities identified for East Fork Lewis River include:

• Remove or set back levees on County owned property in La Center Bottoms;
• Riparian reforestation and wetland creation on Dyer Creek within East Fork Lewis River Greenway; and
• Work with landowners to apply agricultural BMPs at numerous locations noted in SNAP reports.

6.0 CUMULATIVE IMPACTS ASSESSMENT

A cumulative impact assessment was prepared on the March 2011 version of the Clark County Coalition Draft SMP and in June 2011 to address the individual Coalition Draft SMPs.

In March, a preliminary finding of potential net loss was determined. In response, the Coalition staff, with input from citizens and advised by their 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.

Subsequently, cumulative impact assessments were conducted on the June 2011 versions of Coalition members individual Draft SMPs. The June 2011 Coalition Draft Cumulative Impacts Analysis concluded that cumulative impacts would be minimal to moderate and identified several areas with potential for loss of shoreline ecological function. The document provided three concepts for re-evaluation to help offset the potential for loss.

La Center revised several provisions in their Draft SMP which was locally adopted on September 26, 2012. The revised Clark County Coalition Draft Cumulative Impacts Analysis (February, 2012) provides additional detail as to which regulations in the City’s Draft SMP serve to protect ecological functions and processes.

### 6.1 Reasonably Foreseeable Future Development

The table below shows the amount of shoreline properties (both in acres and percent) located in the city of La Center and its urban growth area. Most shoreline properties are classified as *public lands and residential underutilized*. Very few properties are classified as industrial. The numbers in acres and percentages present in this document have been updated from the June 2011 version of this report due to changes in the City’s UGA and other refinement to the data.

**Table 6-1. Distribution of Shoreline Properties in the city of La Center and its UGA**

<table>
<thead>
<tr>
<th>Cumulative Impact Analysis Categories</th>
<th>Acres</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Built</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Underutilized</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Vacant</td>
<td>7</td>
<td>9%</td>
</tr>
<tr>
<td>Industrial</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Built</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Underutilized</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Vacant</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Residential</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Built</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Underutilized</td>
<td>10</td>
<td>12%</td>
</tr>
<tr>
<td>Vacant</td>
<td>6</td>
<td>7%</td>
</tr>
<tr>
<td>Public lands</td>
<td>54</td>
<td>68%</td>
</tr>
<tr>
<td>Tax Exempt Lands</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total acres in shoreline jurisdiction</strong></td>
<td>79</td>
<td>100%</td>
</tr>
</tbody>
</table>
According to the density allowed by the underlying zoning, *residential vacant* lands have the potential to develop with an additional 38 units in La Center and its urban growth area. However, this value does not take into account the percent of land that would be constrained by critical areas, the percent of land necessary to build supporting infrastructure (roads, stormwater ponds), and the likelihood of actual development in the next 20 years (typically referred to as the market factor). (As an example, in the 2007 Buildable Lands Report for King County and its cities, local governments deducted 20-25% of the gross available single family residentially zoned acres for critical areas, discounted 12-13% of the remaining acreage for infrastructure, and further discounted 14-18% of remaining acreage for market factor [properties unavailable for development]. This resulted in nearly half of the available gross acreage being deducted or discounted to forecast buildable lands. These deductions had been validated by analysis of actual development since 2002.) Therefore, the number of potential future residential units depicted in this document for La Center 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 high-impact scenario.

### 7.0 CONCLUSION

The baseline conditions of ecological functions and processes in the 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 environment designations, informed goal and policy development, led to the establishment of protective regulations, and shaped the conclusions of this cumulative impacts analysis. All components of the Coalition’s Cumulative Impacts Analysis (February 2012) are also applicable to this analysis of the City of La Center’s Draft SMP unless otherwise stated in this report.

Based upon the anticipated low levels of foreseeable future development in La Center’s shorelines, the existing shoreline ecological functions of the East Fork Lewis River, cumulative impacts on shoreline ecological functions are not likely under the City’s proposed program.

To continue the trend toward improvement of shoreline ecological functions and to further ensure that potential incremental impacts of exempt activities, illegal actions, and ongoing degradation do not lead to loss of shoreline ecological functions, the following actions are recommended:

- Establish a standard review process for shoreline exemptions to assure that single-family residential and associated exempt activities meet the goals and standards of the program. Since the majority of development is anticipated to be single-family residential and single-family dwellings on pre-existing legal lots are specifically called out as exempt from complying with the critical areas ordinance standards, a formal process for single-family residential development is needed to ensure cumulative impacts do not result.

- Under the Shoreline Designation Changes and Urban Growth Boundary Revisions section it may be helpful to revise Table 4-1 (as shown below) to show that shorelines with Natural designations in rural areas will be assigned a Natural designation in urban areas, and vice-versa, whenever portions of shoreline jurisdiction are brought into or removed from an urban growth area, consistent with Clark County provisions. This is
especially relevant to the shoreline jurisdiction located south of city limits along the south bank of the East Fork Lewis River which is currently designated Natural and has high floodplain, wetland, and habitat value.

**Shoreline Designation for Urban/Rural Boundary Revisions¹**

<table>
<thead>
<tr>
<th>Sending Designation</th>
<th>From/To</th>
<th>Receiving Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aquatic</td>
<td>Rural/Urban</td>
<td>Aquatic</td>
</tr>
<tr>
<td>Natural</td>
<td>Rural/Urban</td>
<td>Rural Conservancy – Natural</td>
</tr>
<tr>
<td>Rural Conservancy –</td>
<td>Rural/Urban</td>
<td>Urban Conservancy</td>
</tr>
<tr>
<td>Residential</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rural Conservancy - Resource</td>
<td>Rural/Urban</td>
<td>Urban Conservancy</td>
</tr>
</tbody>
</table>

¹From September 2012 SMP, Table 4-1

- Based on recommendations in the June 2011 cumulative impacts analysis, the City increased the setback for water-related and water-enjoyment recreational uses in the Urban Conservancy designation to 50 feet in the September 2012 Draft SMP. However, trails are not subject to this setback but must comply with dimensional standards for a Type 6 Water Trail found in the La Center Urban Area Capital Facilities Plan (2008), Appendix C, Figure 16. Type 6 Water Trails require a minimum 20 foot buffer from the water’s edge. It may be helpful to consider consistency with the Clark County SMP standards for trail development that allow trails to meander between 20 and 50 feet from the ordinary high water mark and require trail projects to maintain no net loss of shoreline ecological function and include shoreline restoration when feasible.

- Establish a citywide shoreline restoration program to restore degraded habitats in the shoreline. Use of citywide shoreline restoration to offset cumulative impacts is allowed and encouraged by the shoreline guidelines. Incorporate opportunities identified in the Coalition Restoration Plan specifically focused on the following:
  - Revegetation of degraded riparian zones;
  - Enhancement of degraded wetlands; and
  - Preservation of associated wetlands and floodplains through purchase of lands.