

memorandum

date June 30, 2011

to Justin Clary, City Manager City of Ridgefield

from Reema Shakra, Teresa Vanderburg, Ikuno Masterson, ESA

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

Introduction

The purpose of this memo is to demonstrate how City of Ridgefield Draft Shoreline Master Program (SMP) achieves “no net loss” of shoreline ecological functions. This summary is based on the conclusions of the City of Ridgefield 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 Ridgefield 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 Ecology 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 of Ridgefield: Lake River and Gee Creek. There are a total of five linear stream miles in the city of Ridgefield and its urban growth area.

Lake River extends for 0.8 miles through the City of Ridgefield, and contains approximately 126 acres of shoreline habitat. A significant portion of the shoreline is used for moorage facilities including spaces for boathouses, houseboats, and covered slips. Bank armoring is located along a significant portion of the shoreline in the jurisdiction. Railroad tracks are located along the eastern bank, parallel to the stream course. Upstream pollutants and urban runoff to Burnt Bridge Creek and Salmon Creek (tributaries to Lake River) have resulted in impaired water quality within the river. Modifications have reduced the connectivity between the river and its natural floodplain.

Gee Creek extends for 4.1 miles through the city of Ridgefield and its urban growth area, and contains approximately 191 acres of shoreline habitat. Shoreline modifications located along Gee Creek in the jurisdiction include numerous road crossings, significant land clearing in the shoreline and riparian area, and privately owned dams and stormwater detention ponds. These modifications threaten or reduce water quality and quantity, increased sediment and stormwater runoff, reduce shoreline and riparian habitat, and a reduce river floodplain connectivity.

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 Ridgefield shorelines include:

- Riparian and shoreline habitat
- Water quality and quantity,
- River/floodplain connectivity

Reasonably Foreseeable Future Development

There are nearly 146 acres of shoreline are in Ridgefield and its UGA. All vacant lands are zoned for residential development, with a potential for an additional 196 units over the next 20 years. The number of future residential units is higher than would likely 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. While there is a relatively high potential for industrial redevelopment, that redevelopment would occur on a former remediation site.

Cumulative Impacts Assessment

A cumulative impact assessment was developed 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 Medium Intensity to Urban Conservancy and adjusted accessory parking

and structure setbacks in the Urban Conservancy shoreline designation. These revisions were incorporated into the City of Ridgefield Draft SMP (June, 2011). The Clark County Coalition Draft Cumulative Impact Analysis (June, 2011) provides additional detail as to which regulations in the Ridgefield Draft SMP serve to protect ecological functions and processes. The assessment of future performance in the last column of the WRIA 27 tables in Appendix A are also applicable to the waterbodies in and around Ridgefield.

Based on the relatively degraded condition of the Lake River shoreline and the moderate redevelopment potential along Gee Creek, cumulative impacts to shoreline function in Ridgefield and its UGA is not anticipated (City of Ridgefield Cumulative Impacts Analysis and the Clark County Coalition Draft Cumulative Impacts Analysis June, 2011).

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 environment designations, informed goal and policy development, led to the establishment of protective regulations, and shaped the conclusions of the cumulative impact analysis.

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

To continue the trend toward improvement of ecological functions and to assure that a conclusion of "no net loss" of shoreline functions can be maintained 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, particularly vegetation conservation;
- Due to the proximity of the Ridgefield National Wildlife Refuge, consider specific protections or development provisions to protect habitat in the NWR;
- Further limit where and under what circumstances single-use piers and docks may be permitted; and
- Prioritization and commitment to programs and projects outlined in the Restoration Plan, specifically focused on restoration of degraded habitats in the shoreline citywide.