



April 1, 2023

Attn: Malene Garcia-DeBoard  
City of Woodland Community Development – Land Use  
230 Davidson Avenue  
Woodland, WA 98674

**Re: Lewis River Subdivison – Shoreline Narrative.**

AshEco Solutions, LLC (AES) was contracted by the applicant (Luke Sasse of Timberland, Inc.) to review the City of Woodland Shoreline Master Program (SMP) for the allowances related to the shoreline designation and project proposal. AES has also coordinated on the site plan design and drafted the Critical Areas Report and Mitigation Plan (April 1, 2024), in addition to preparing this shorelines narrative for the proposed project as part of the Shoreline Substantial Development Permit submittal requirements.

AES has concluded that the proposal can be completed within the existing Residential and Urban Conservancy shoreline with no net loss of habitat with implementation of the proposed mitigation plan. The project meets the outlined criteria within the City of Woodland Shoreline Master Plan (SMP) and Appendix B of the SMP, Critical Areas Regulations.

**EXISTING CONDITIONS**

The northern section of the project site has been in agricultural use since at least the 1950s. The area has been maintained in grass and hay. The site slopes south from Lewis River Road to the Lewis River floodplain. The southern section of the subject site is dominated in mature black cottonwood trees, mixed native shrubs, and invasive shrubs and herbs. No structures are present on the site. A dirt and gravel road is present crossing the property which provides unauthorized public access to the Lewis River. A city stormwater easement 30 feet wide (containing a 36-inch stormwater pipe) crosses the subject property north to south in the westernmost subject parcel, a 75-foot natural gas line easement crosses diagonally over the two easternmost subject parcels, and a City utility and access easement crosses all four central parcels. The parcel located directly south-central of the project site is owned by the City of Woodland, no structures or formal site access are currently present. The subject site is highly constrained due to easements, the Lewis River floodway and 100-Year floodplain, riparian habitat areas, shorelines, and wetland buffers. AES visited the subject site during multiple site visits between May and September of 2022 to assess and map the onsite critical areas and existing conditions.

The City of Woodland and its surroundings are currently in a housing crisis, there is a severe lack of affordable single-family residential lots in the area. There are few places within city limits that can accommodate large residential developments and most sites are highly constrained by geography and critical areas. The proposed project will greatly benefit the City of Woodland providing 85 new residential units, public trail access to the Lewis River shoreline and restoration of the historically degraded shoreline habitat.

The northern portion of the site consists of an open field, with portions of the central and southern areas of the site forested in black cottonwood, Oregon ash with some native understory and patches of non-native shrub species. The northern open field provides minimal shelter or forage opportunities for wildlife. The minimal functions provided by the existing field dominated in herbaceous vegetation will be offset by the restoration area consisting of a mixed mosaic of open herbaceous meadow areas, clusters of native scrub-shrub vegetation and woody habitat features. This mixed mosaic will provide a higher functioning habitat to the wildlife than that currently present onsite. The ordinary-high-water mark of the Lewis River and an associated Category II riverine wetland was inventoried just off site to the south by AES.

## **PROJECT PROPOSAL**

The applicant proposes to construct a single-family residential development within the High Density Residential (HDR) zone. The development will include 85 single-family detached residential lots within the northern limits of the subject site. The proposal includes the addition of dedicated public trail access to the Lewis River shoreline. The public trail proposed will provide a minimum of 1,721 feet of defined trail and loop, with a connection north to Lewis River Road through the project site. A large shoreline and floodplain restoration area is also proposed. The project has been designed following City of Woodland Municipal Code (CMC) Section 15.08 Critical Areas Regulation and the City of Woodland SMP. The site is undeveloped with no structures or formal site access is present. With the full site encumbered by the 100-Year floodplain and critical areas, impacts are unavoidable. The permanent and temporary impacts proposed within the project site have been minimized to the greatest extent practicable and the restoration proposed will allow for no net loss of habitat functions for the onsite critical area habitat. The proposed development location is the most practical due to site access, utilities and avoids and minimizes the impacts to the onsite critical areas.

## **SMP DESIGNATION**

The City of Woodland classification system outlined within the City of Woodland SMP (June 2021) consists of Shoreline Environment Designations (SED) that are consistent with and implement the Act (RCW 90.58), the Shoreline Master Program Guidelines (WAC 173-26) and the City of Woodland Comprehensive Plan. These mapped designation areas have been assigned consistent with the corresponding criteria provided for each shoreline designation. In delineating shoreline designations, the City of Woodland aims to ensure that existing shoreline functions are protected with the proposed pattern and intensity of developments. The subject parcel has been designated as both a “Residential” and “Urban Conservancy” shoreline by the SMP.

## **RESIDENTIAL SED**

### Purpose

The purpose of the Residential SED is to accommodate residential development and appurtenant structures that are consistent with the SMP. The project is a residential development, meeting the purpose criteria outlined for the Residential SED.

### Management Policies

The management policies outlined for the Residential SED following SMP Chapter 5.3.2 are listed below in italics. The response for how the project meets the policy criteria follows in underlined text.

- A. *Development in the Residential designation should assure no net loss of shoreline ecological functions. New residential development should take into account the environmental limitations and sensitivity of the shoreline area, the level of infrastructure and services available.*

A mitigation plan to offset the proposed impacts and ensure no net loss of shoreline ecological functions has been prepared on behalf of the project. The single-family residential development project has been located outside the most sensitive habitat located directly adjacent to the Lewis River and has been designed to hold the limits of the Riparian Habitat Area (RHA) and floodway following the SMP as well as meet the additional building setbacks from the RHA. The proposed project is also located directly

adjacent to the existing Lewis River Road which allows the project to utilize the existing infrastructure and utility services available from the City of Woodland and the city's utility providers.

- B. *developments and recreational developments should provide public access and joint use for community facilities in compliance with this Program.*

The single-family residential development project has been designed to provide public access to the Lewis River shoreline through the establishment of a new pedestrian trail with trailhead from the southwest corner of the proposed project. The trail will meander southeast from the trailhead and continue into the adjacent City of Woodland property located directly south of the subject site where it will loop, providing a minimum of 1,721 feet of defined trail for public recreational use. The trail will allow for public recreation, enjoyment and viewing opportunities of the Lewis River shoreline.

- C. *Access, utilities, and public services should be available and adequate to serve existing needs and/or planned future development.*

The project has been located directly along the existing Lewis River Road which allows for the project to utilize the existing public access road and utilities present within the easement of the Lewis River Road.

- D. *Commercial development should be limited to water-oriented uses.*

The project does not include commercial development.

#### Designation Criteria

The designation criteria for the Residential SED is assigned to shoreline areas if they are predominantly single-family or multi-family residential development or are planned and platted for residential development. The project is a single-family residential development, meeting the designation criteria outlined for the Residential SED.

#### **URBAN CONSERVANCY SED**

##### Purpose

The purpose of the Urban Conservancy SED is to protect and restore ecological functions of open space, floodplain, and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses. Activities permitted in these areas are intended to have minimal adverse impacts upon the shoreline.

The project has been designed to avoid and minimize impacts to the shoreline to the full extent reasonable while still meeting the project goals and design standards to providing residential housing for the City of Woodland where there is currently a deficit. A mitigation plan to offset the proposed impacts and ensure no net loss of shoreline ecological functions has been prepared on behalf of the project.

##### Management Policies

The management policies outlined for the Urban Conservancy SED following SMP Chapter 5.3.3 are listed below in italics. The response for how the project meets the policy criteria follows in underlined text.

- A. *Primary allowed uses within this designation should preserve the natural character of the area or promote preservation of open space, floodplain, or other sensitive lands where they exist in urban and developed settings, either directly or over the long term.*

The project is considered a primary allowed use within the Urban Conservancy SED. The project goal is to both provide single-family residential housing for the City of Woodland where there is currently a deficit of such housing, while also providing greater floodway storage for the Lewis River floodplain and an overall higher functioning shoreline habitat in the long term through the implementation of the proposed mitigation plan.

- B. *Standards should ensure no net loss of ecological functions and significant ecological impacts can be mitigated.*

Impacts to the highest functioning biological resources have been avoided and the proposed impacts will not degrade the rural or natural character of the adjacent shoreline. Implementation of the onsite mitigation plan measures will allow for no net loss of shoreline ecological function.

- C. *Public access and public recreation objectives should be implemented whenever feasible, but only when any resulting significant ecological impacts can be mitigated.*

The project has been designed to incorporate public access to the shoreline through the creation of a defined recreational pedestrian trail. The public recreational access was designed to avoid significant ecological impacts to the shoreline and associated critical areas. No permanent impacts are proposed. The trail will consist of a wood-chip path and will meander around the mature trees within the City of Woodlands parcel.

- D. *Water-oriented uses should be given priority over non-water oriented uses. For shoreline areas adjacent to commercially navigable waters, water-dependent uses should be given highest priority.*

The project is considered a non-water oriented use and the Lewis River is considered a commercially navigable water. However, out of the 18 miles of river only approximately 0.18 miles is listed under a federally authorized project and only the first two miles is maintained for navigational purposes. Therefore, with the project site located approximately 7.8 miles up-stream from the Columbia River it is considered to be located beyond the navigational point of commerce for the Lewis River and therefore not applicable to the proposed non-water oriented use.

## **GENERAL SHORELINE REGULATIONS – Chapter 6**

### **Chapter 6.1 No Net Loss of Ecological Function**

The project has been designed to meet the provisions of this chapter as outlined in Chapter 6.1 (A-F). With the most applicable criteria to the project being A, B, C, E and F.

Following Chapter 6.1(A), the development has been designed to be located, constructed, conducted and maintained in a manner that maintains shoreline ecological functions, in accordance with the mitigation sequencing provisions of the SMP.

Following Chapter 6.1(B), the development has been designed to protect the shoreline ecological functions including, but are not limited to, fish and wildlife habitat, food web support, and water quality maintenance.

Following Chapter 6.1(C), shoreline processes to be protected by implementation of the mitigation plan and stormwater design include groundwater recharge and discharge, floodplain storage, retention of large woody debris and recruitment, organic matter input, and nutrient and pathogen removal.

Following Chapter 6.1(E), the project has provided sufficient mitigation such that the activity does not result in net loss of ecological functions. Mitigation measures have followed the mitigation sequencing of avoiding impacts to the highest functioning habitat, minimizing adverse impacts and rectify the adverse impacts by rehabilitating, or restoring the affected environment. The mitigation plan further compensates for the adverse impacts by replacing, enhancing, and providing similar substitute resources or environments onsite within the jurisdictional shoreline.

Following Chapter 6.1(F), the applicant has provided this shoreline narrative and associated Critical Areas Report and Mitigation Plan to show that the proposed development is consistent with the criteria set forth in the SMP and the SMA.

### **Chapter 6.3 Critical Areas Protection**

The project and mitigation plan has been designed to comply and follow Chapter 6.3 as well as Appendix B (Critical Areas Regulations) of the SMP. The applicable critical areas regulated under this chapter and SMP

identified onsite or immediately offsite are wetlands, frequently flooded areas, CARA and fish and wildlife habitat conservation areas.

## **CRITICAL AREAS REGULATIONS – SMP APPENDIX B**

### **SMP Appendix B (Chapter 4.0 Administration & Chapter 5.0 Wetlands)**

The general requirements and provisions required under SMP Appendix B – Chapters 4.0 and 5.0 Wetlands have been covered and outlined by the Critical Areas Report and Mitigation Plan (January 5, 2023). The wetland is located offsite from the subject parcel yet was inventoried as part of the project in an effort to establish the correct boundary, wetland category/HGM classification/habitat functional score (Category II Riverine with habitat score of 8) and required buffer requirements as required by Chapter 5.0. The buffers (150-foot Low, 225-foot Mod and 300-foot High Land Use Intensity) were determined to encroach into the subject site. All direct impacts to the wetland will be avoided and the buffer impacts have been avoided to the full extent reasonable – with just a small portion of the outer (High LUI) 300-foot buffer proposed for temporary impacts by the excavation proposed by the project.

### **SMP Appendix B (Chapter 6.0 Critical Aquifer Recharge Areas)**

Following Chapter 6.2 Critical Area Report Requirements for Aquifer Recharge Areas, the city may determine that additional hydrologic assessment may be required for the project due to the amount of impervious surface area proposed. However, the project does not propose uses or activities that will cause contaminants to enter the groundwater or adversely affect aquifer recharge, and thus it is not anticipated to be detrimental to the mapped CARA onsite. Additionally, the project can meet the general performance standards outlined by Chapter 6.3. The project has been designed to comply with requirements of the EPA, WA Department of Health, Department of Ecology, and Cowlitz County Health and Human Services.

### **SMP Appendix B (Chapter 7.0 Frequently Flooded Areas)**

The response for how the project meets the applicable provisions outlined under Chapter 7.0. Following Chapter 7.0(A), the subject site is located within mapped Federal Emergency Management Agency (FEMA) 100-Year floodplain and floodway and has been designed to comply with Chapter 7.0 Frequently Flooded Areas of the Critical Areas Regulation under the SMP. No fill is proposed within the floodway, and all fill proposed within the floodplain will be offset to allow no net rise of the floodplain. The ecological functions temporarily impacted by the cut and fill proposed within the floodplain will be offset by implementation of the mitigation plan. Following Chapter 7.0(B), the project has been designed to comply with *the City of Woodland floodplain management ordinance, Chapter 14.40 of Woodland Municipal Code (1996), while still maintaining the ecological functions of the shoreline.*

### **SMP Appendix B (Chapter 9.0 Designation of Fish and Wildlife Habitat Conservation Areas)**

The general requirements and provisions required under SMP Appendix B – Chapter 9.0 Fish and Wildlife Habitat Conservation Areas have been covered by the Critical Areas Report and Mitigation Plan (April 1, 2024). The Lewis River, a Type S Water, is located offsite from the subject parcel yet was inventoried as part of the project in an effort to establish the correct ordinary-high-water-mark boundary and required buffer requirements as required by Chapter 9.0. The Lewis River within the specific shoreline Reach Number assigned to the location of the project site (W-10) and the SED (Urban Conservancy/Residential) which was determined to require a Riparian Habitat Area (RHA). The required RHA extending “from the OHWM to 10 feet landward of the FEMA Floodway, or 75 feet, whichever is greater” following Chapter 9.0 Table B-4 has been applied and held by the permanent impacts associated with the project. The project intends to fully comply with Chapter 9.0, by constructing the single-family residential development project outside of the RHA. All temporary impacts within the RHA will be fully mitigated for following the mitigation plan.

## **VEGETATION CONSERVATION**

### **Chapter 6.6**

The project has been designed to comply with the criteria listed under Chapter 6.6 sections A-D. The setback and buffer provisions of the SMP as outlined under Table 7-1 and Appendix B Table B-4 have been met to protect and maintain shoreline vegetation. The permanent project impacts are proposed outside the RHA and 10 feet landward of the FEMA Floodway. Additionally, this location is located over 600 feet away from the OHWM of the Lewis River outside the most significant habitat and located directly adjacent to the existing Lewis River Road. The vegetation clearing within shorelines has been limited to that necessary to accommodate the approved shoreline development as fill will be required within the floodplain to bring the residential structures above the floodplain elevation, thus resulting in the need to offset the floodplain fill with excavation onsite in the form of floodway storage and shoreline restoration of a degraded habitat area. The proposed mitigation plan has been designed to allow for no net loss of ecological functions as required under Section 6.1. The project does not include aquatic weed control.

## **WATER QUALITY AND QUANTITY**

### **Chapter 6.7**

The project has been designed to comply with the criteria listed under Chapter 6.7 sections A-D. A professional engineer has developed a stormwater design following best management practices to prevent impacts to water quality and stormwater quantity to prevent a net loss of shoreline ecological functions and/or significant impact to aesthetic quantities or recreational opportunities. The stormwater management structures have been designed to avoid significant impact to the shoreline jurisdiction or fish and wildlife habitat buffers. Following 6.7(B), low impact development facilities recognized to not substantially change the character of the shoreline (vegetation filter strips, grass-lined swales, and vegetated bioretention and infiltration facilities) will have preference in the final design as required by the project within shorelines. Following 6.7(C), the application of pesticides, herbicides and fertilizers within the proposed shoreline restoration area is not proposed. Following 6.7(D), the single-family residential development project will connect to an existing municipal sewer service system.

## **SHORELINE USE AND MODIFICATION REGULATIONS**

### **Chapter 7.0**

The project has been designed to comply with the criteria listed under Chapter 7.0, and Table 7-1 Shoreline Use, Modification, Setbacks, and Heights. The project site consists of both the Residential SED and the Urban Conservancy SED. The building setback requirement “ten feet landward of the FEMA Floodway, or 75 feet, whichever is greater” following Chapter 9.0 Table B-4 are the same for both the Residential and Urban Conservancy SED, as is the building height maximum of 35 feet. The project has been designed to meet the building setback (as it is located ten feet landward of the FEMA Floodway), as well as the building height requirements with the average height of the proposed gabled roof to be 35 feet or less.

#### **Chapter 7.2.11 Residential**

The project has been designed to comply with the criteria listed under Chapter 7.2.11 (Sections A-G). Following 7.2.11(A) the new residential development will comply with the shoreline buffer provisions of Section 9.4 of Appendix B. The residential development will not require shoreline stabilization, will not obstruct views from the existing residential uses located west and east. The residential subdivision located north of Lewis River Road does not have views focused south across Lewis River Road towards the shoreline, thus these views will also not be obstructed by the project. View corridors, landscaping and restoration areas have been incorporated into the site plan design. The project does not propose permanent impacts below the ordinary high water mark, over water, or within floodways. The residential project has been designed to incorporate structural flood hazard reduction and shoreline stabilization measures to sustain the project for the life of the use. The project has been designed to allow feasible construction within the floodplain while achieving no net loss of ecological functions through the implementation of the approved mitigation plan.

### **Chapter 7.3.3 Fill and Excavation**

The project has been designed to comply with the criteria listed under Chapter 7.3.3 (Sections A-E). Following 7.3.3(A), fill may be placed in a flood hazard area only when otherwise allowed by the frequently flooded areas regulations in the SMP (Chapter 7 in Appendix B) and where it is demonstrated that adverse impacts to hydrogeologic processes will be avoided. The project does not propose fill below or waterward of the OHWM, or within in wetlands or fish and wildlife habitat conservation areas (in accordance with the critical area standards in the SMP and Appendix B, Chapters 5 and 6). The project does not propose dredging activities.

### **Chapter 7.3.5 Shoreline Habitat and Ecological Enhancement Projects**

The project has been designed to comply with the criteria listed under Chapter 7.3.5 (Sections A-E). Following 7.3.5 the mitigation plan has been designed using best management practices to allow for the restoration of the onsite shoreline habitat while ensuring a net increase in the ecological improvement and habitat functions over time. The mitigation plan proposes to restore the historically degraded shoreline habitat present onsite by providing a diverse multi-layered vegetation structure, vertical and horizontal diversity and an increase in floodplain storage. The plan also outlines long-term maintenance and monitoring performance standards.

### **SUMMARY**

The project has been designed to fully comply with the applicable sections of the SMP and Appendix B – Critical Areas Regulations. The project proposal of constructing a single-family residential development fits the appropriate use criteria for the Residential SED, as does the proposed mitigation plan and shoreline restoration proposed within the Urban Conservancy SED. The mitigation proposal has been designed to allow for not net loss of shoreline habitat function and restore the historically degraded shoreline habitat present onsite. For additional project and mitigation details see the associated Critical Areas Report and Mitigation Plan developed on behalf of the project by AES.

#### ***Preparer:***

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#### ***Attachments:***

Critical Areas Report and Mitigation Plan (April 1, 2024)