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**COMMUNITY PLANNING &  
ECONOMIC DEVELOPMENT DEPARTMENT**

*Creating Solutions for Our Future*

Joshua Cummings, Director

**MEMORANDUM**

**TO:** Planning Commission

**FROM:** Andrew Deffobis, Interim Senior Planner

**DATE:** April 13, 2022

**SUBJECT:** Shoreline Environment Designation Reviews & Background

**Introduction & Background**

The Planning Commission is being provided additional information regarding shoreline environment designations (SEDs) ahead of the planned work session on April 20, 2022, staff will ask for direction from the Planning Commission on the five case studies presented in this memo.

During the public hearing comment period for the SMP Update, the Planning Commission received comments for approximately twelve shoreline environmental designation reaches, with citizens requesting the County consider different designations than what was proposed.

Overall, the Shoreline Master Program (SMP) update has been under review with the Planning Commission since 2017. Shoreline environment designations (SEDs) have been the topic of many of the Planning Commission discussions, both prior to and after the October 20, 2021, public hearing. Recommendations on these reaches are a portion of the overall Planning Commission recommendation to the Board of County Commissioners (Board). The Board is eager to receive the Planning Commission's recommendation and begin its review so the County may meet its statutory requirement to produce a comprehensive SMP update.

**Shoreline Environment Designation Process**

The SMP is built upon an [inventory and characterization](#) and includes proposed environment designations for the County's shorelines, which were developed in an earlier phase of the project. The Inventory & Characterization report serves as a snapshot of shoreline conditions for planning purposes. The County conducted field reviews and reviewed available data to assemble information on the existing condition of County shorelines, including but not limited to physical

features, priority habitats and species, water quality, riparian vegetation width, land use, zoning, development potential, public access, shoreline modifications, and management issues and opportunities.

This Inventory and Characterization Report and report supplement were used alongside designation criteria based on Ecology's recommended Shoreline Environment Designation system ([WAC 173-26-211](#)) to propose shoreline environment designations (SEDs) for County shorelines. SEDs contribute to achieving no net loss of ecological function by tailoring allowed uses, permit requirements, and development and mitigation standards to different shoreline environments based on their sensitivity and level of ecological function. SEDs range from relatively undisturbed "Natural" shorelines to more highly developed, impacted "Shoreline Residential" shorelines. The County's [SED Report](#) and [SED Report supplement](#) describe SEDs used in the SMP update, the methodology for assigning designations to shoreline reaches, and lists the proposed designations for shoreline reaches.

Staff have attempted to analyze the current SED review requests in a manner consistent with how the County conducted this work for all shoreline reaches earlier in this project. The County uses the best information available in planning and permitting decisions. However, the scope of the current review and available resources are smaller than previous efforts, and there are limitations to the analysis that can be provided. The Planning Commission is encouraged to consider the decisions before them in a landscape context, as it is difficult in some cases to focus the data at hand to the parcel or sub-parcel level. In addition, the SED criteria were not intended to be applied at a parcel-by-parcel level.

Staff acknowledges that many of the review requests focus on individual parcels, or portions of parcels. Many times, these have been in areas where one reach ends and another begins (known as reach breaks). Shoreline reaches were identified during the Inventory & Characterization, and that information was used to apply appropriate SEDs to these reaches. It may be instructive to review how proposed reach breaks were formed during the inventory and characterization:

During the creation of final reach breaks, an effort was made to place reach break points on parcel lines. This was done to avoid the potential for a parcel to contain more than one environmental designation. Due to the emphasis of placing reach break points on parcel lines, these locations do not always exactly line up with the locations of key environmental changes (e.g., topography might begin to change shortly before or after a reach break point). Breaks were located closest to the environmental change that was also on a parcel line. Despite this focus on parcel line reach break placement, there were some instances when a reach break was located mid-parcel because that was where the geographic change occurred (e.g., basin lines). This was particularly true when an environmental change occurred within a large parcel. (Inventory & Characterization, p. 13)

### **Citizen Requests for Specific Shoreline Reaches**

Staff plan to review five citizen requests at the April 20, 2022 meeting. Staff recommendations and options are summarized in this memo. A more detailed review of each request is attached, in draft form. In addition, the Planning Commission may review the [SED comparison web tool](#) that was developed to enable the user to view County shorelines and toggle between current and proposed SEDs.

#### **Eld Inlet (Reach MEL-09—MEL-10)**

This request was to review the proposed SED for Reach MEL-09—MEL-10 on Eld Inlet. The reach is currently designated Rural, with a proposed Rural Conservancy SED. The citizen requested a Shoreline Residential SED for this reach, consistent with other reaches to the south.

Staff analysis for this reach is attached. Based on a review of the designation criteria in the County's SED report and existing shoreline conditions, the existing ecological function in this reach would be best protected by retaining the proposed Rural Conservancy SED for this reach. This SED appears best suited to achieve no net loss requirements.

The Planning Commission could opt to retain this designation, or propose a different option that is consistent with the designation criteria and prevention of net loss of ecological function.

#### **Pattison Lake (Reach LPA-7—LPA-8)**

This request came from a landowner on Pattison Lake who owns a parcel at the southern end of Reach LPA-7—LPA-8. Their home is one parcel to the south, at the southern end of Reach LPA-8—LPA-1. The request is to extend the proposed Shoreline Residential SED in Reach LPA-8—LPA-1 onto a portion of an adjacent parcel they own in Reach LPA-7—LPA-8 (APN 11702140600), to essentially encompass the portion of the adjacent parcel that is in residential use. The area in question is currently designated Conservancy (a small piece is Rural), and the proposed SED is Natural.

Staff analysis is attached. Based on a review of existing conditions and the designation criteria, staff propose retaining the proposed designation of Natural on the parcel. The parcel in question does not appear to have significant alteration. The proposed SED appears to be best suited to achieve the SMP's no net loss requirement, and this approach would be consistent with the overall methodology of avoiding sub-parcel reach breaks and multiple SEDs on a single parcel.

The Planning Commission may opt to retain the Natural SED for this parcel or propose a different option that is consistent with the designation criteria.

#### **Pattison Lake (Reaches LPA-8—LPA-1 and LPA-2—LPA-3)**

This request was to review the portions of Reaches LPA-8—LPA-1 and LPA-2—LPA-3 where the lake is bisected by a railroad crossing, associated fill and adjacent wetlands. The area is

currently designated Rural and proposed to be designated Shoreline Residential. A citizen has suggested that Rural Conservancy or Urban Conservancy would be a better fit.

Staff analysis is attached. Based on a review of designation criteria and how similar areas were designated, staff would support either retaining the existing proposed SED, or changing it to Urban Conservancy.

The Planning Commission may opt to retain the proposed Shoreline Residential SED for this portion of the reach, change the proposed SED to Urban Conservancy, or propose a different option that is consistent with the designation criteria.

#### **Lake St. Clair (Reach LSC-1—LSC-2)**

This request was to change the proposed SED for a parcel on Reach LSC-1—LSC-2 of Lake St. Clair from Natural to Shoreline Residential, given that a home has been constructed on the parcel. Staff analysis is attached. Based on a review of existing conditions and the designation criteria, staff recommend a Rural Conservancy SED. This SED would reflect that development has occurred onsite but that ecological function still remains.

Planning Commission may opt to change the proposed designation for this parcel to Rural Conservancy, or a different SED consistent with the designation criteria. If the proposed SED changes, the Planning Commission could create a stand-alone reach for this parcel, or leave the parcel in its existing reach.

#### **Deschutes River (Reach DE-17—DE-18)**

This request was to change the proposed SED for one parcel within Reach DE-17—DE-18 from Natural to Shoreline Residential. Staff analysis is attached. Based on a review of designation criteria and existing conditions, it appears most of this reach better fits the criteria for Rural Conservancy given development patterns within shoreline jurisdiction. Parcels enrolled in Designated Forest Land north of the subject parcel appear to best meet the criteria for the Natural SED. Staff recommends making these SED changes and moving reach break DE-17 south to the northern parcel line of the subject parcel.

The Planning Commission may opt to change proposed SEDs within this reach consistent with the destination criteria. Additionally, the Planning Commission may choose to move the DE-17 reach break south to the boundary between developed parcels and forestry parcels.

## SED Review Analysis: Eld Inlet – MEL-09—MEL-10

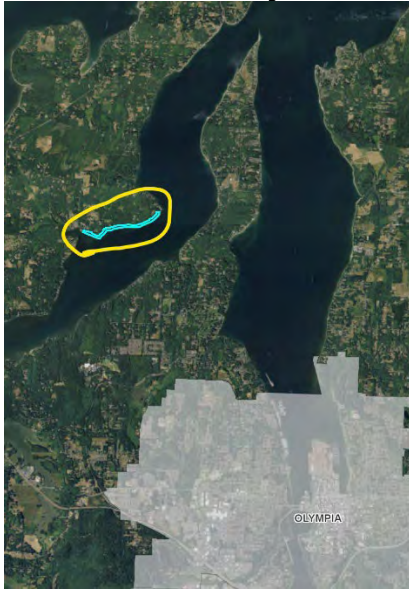


Fig. 1. General location of Reach MEL-09—MEL-10 on Eld Inlet, circled in yellow.



Fig. 2. Western end of Reach MEL-09—MEL-10.

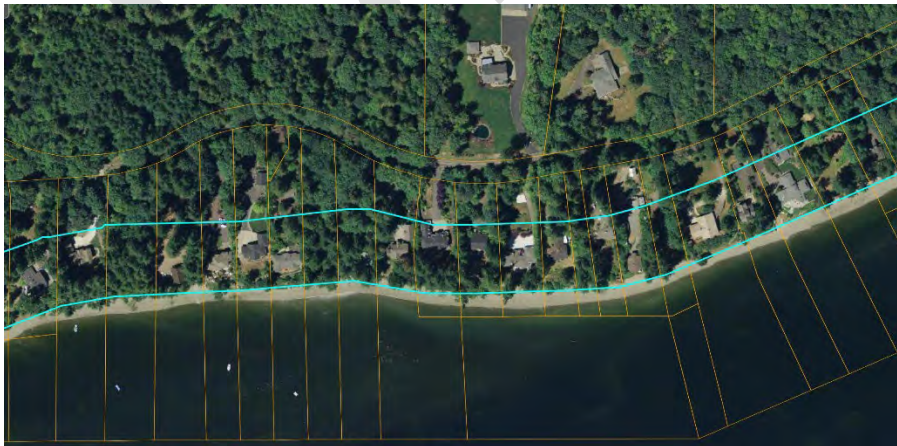


Fig. 3. Central portion of Reach MEL-09—MEL-10.





Fig. 4. Eastern end of Reach MEL-09—MEL-10

Current SED: Rural

Proposed SED: Rural Conservancy

Citizen Request: Shoreline Residential

Staff Analysis:

This reach of Puget Sound shoreline on the west side of Eld Inlet is identified as MEL-09—MEL-10. During the recent public comment period, a citizen has requested a Shoreline Residential SED for this reach, stating that it has been developed consistently with reaches to the south, which are proposed to be designated Shoreline Residential.

The following tables provide a review of the Rural Conservancy and Shoreline Residential designation criteria from the Thurston County SED Report, alongside information about Reach MEL-09—MEL-10 contained in the SED Report, Inventory & Characterization (I&C), county GeoData mapping, and other sources.

#### **Rural Conservancy SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:	SED report includes this criteria.	Yes, reach is outside cities and UGAs.

Currently supporting low-intensity resource based uses such as agriculture, forestry, or recreation.		Not significantly. May support private recreation at parcel scale, though residential use is primary use of reach.
Currently accommodating residential uses	SED report includes this criteria.	Yes. Residential use is the prevailing use of this reach. The majority of lots have primary residences within 125 feet of the shoreline, and many are closer than that. Very few vacant lots exist.
Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas	SED report includes this criteria, noting unstable slopes, steep slopes, potential landslide areas, past landslides.	Yes. Mapped floodplain appears to encroach on several properties. Steep slopes also noted in GeoData.
Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes	<p>SED report includes this criteria.</p> <p>SED report notes reach is prioritized high for forage fish habitat preservation/restoration: Gravel, high bluffs, many landslides, littoral connection (North portion of reach); High: reasoning Littoral input (South portion of reach) (Herrera and TRPC 2005).</p> <p>Reach may contain the following species: purple martin, smelt, sand lance, rock sole. Reach may contain the following</p>	Most parcels are already developed, though many still retain function in the buffer as evidenced by the presence of native vegetation. Further development would be subject to vegetation conservation and development standards of SMP to prevent loss of ecological function. Low-intensity uses may be best for areas that retain high ecological function.

	habitats: shellfish spawning, rearing and harvesting areas, smelt/sand lance and rock sole spawning beaches. Per I&C, restoration is noted as the preferred management strategy for this reach (Puget Sound Water Flow Characterization Management Strategies, Stanley et al., 2012)	
Private and/or publicly owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.	None Noted	None noted in GeoData. Puget Sound and its shorelines are of significant cultural value to area tribes.
Does not meet the designation criteria for the Natural environment.	SED report includes this criteria.	This reach does not appear to meet the Natural criteria based on development patterns.

#### **Shoreline Residential SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Natural SED: no. Rural Conservancy: yes, meets several criteria.
Predominantly single-family or multifamily residential development or are planned and platted for		Yes. Most parcels have residential development, only a few vacant parcels exist. Many homes are close to the water, and the majority are within est. 125 feet. Some homes are further from the water but have alterations to



residential development.		property closer to the water in shoreline jurisdiction (appurtenances, bulkheads, lawn). Zoning is LAMIRD 1/1.
Majority of the lot area is within the shoreline jurisdiction.		Yes, overall. This criterion is also met when considering only the landward extent of parcels.
Ecological functions have been impacted by more intense modification and use.	<p>SED report notes: Shoreline vegetation is shrub and fragmented forest, with evidence of development and clearing for residential use. Bulkheads throughout reach.</p> <p>I&amp;C notes reach as moderately degraded (PSNERP Strategic Needs Assessment, Schlenger, 2011).</p>	Vegetation is still heavy in some areas and provides ecological function, with some parcels in an intact state, though the majority of lots feature homes within an estimated 125 feet of the water (many are significantly closer). Bulkheads are visible on many lots. Overall, development does not appear as dense or close to the water as in many other reaches with a Shoreline Residential SED.

#### Conclusions:

Single family residences are the prevailing development in this reach. This reach is mapped with environmental limitations, including steep slopes and floodplain. The majority of lots appear to have primary residences encroaching within the buffer that a Rural Conservancy SED would provide; however significant amounts of native vegetation still exist in several areas. Other lots with homes outside that buffer exhibit modifications between the home and water.

#### Staff Recommendation:

Based on the level of ecological function that remains along the shoreline, staff concur with the original proposed designation of Rural Conservancy. Even with the degree of development present, a Shoreline Residential SED would allow for additional development in areas that are currently vegetated and/or undeveloped and could lead to a net loss of ecological function.

## SED Review Analysis: Pattison Lake – LPA-7—LPA-8 – APN 11702140600

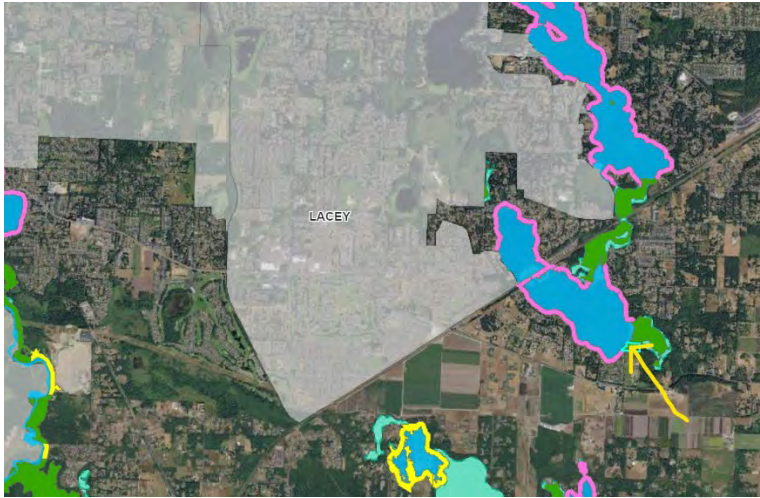


Fig. 1. General location of Reach LPA-7—LPA-8, indicated by yellow arrow.

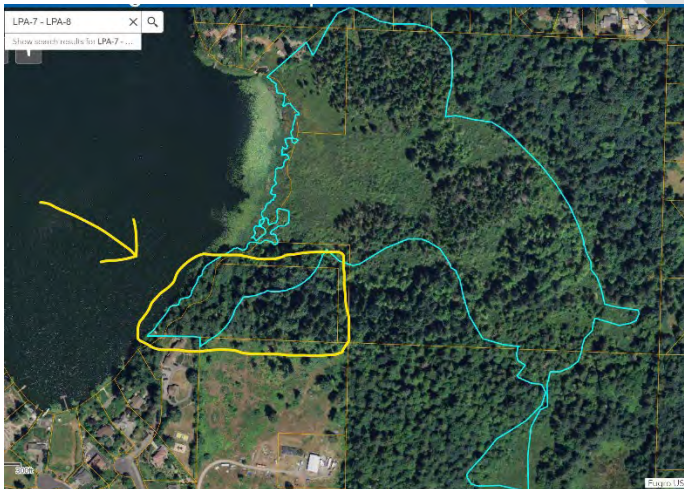


Fig. 2. Aerial view of subject parcel (circled in yellow), and mapped extent of Reach LPA-7—LPA-8.



Fig. 3. Zoomed in aerial photograph of subject parcel.

Current SED: Conservancy (small portion at southern end of reach is Rural)

Proposed SED: Natural

Citizen Request: Shoreline Residential (for portion of APN 11702140600), Natural for remainder

Staff Analysis:

This reach of Pattison Lake, located at the southern end of the lake, is identified as Reach LPA-7—LPA-8. During the recent public comment period, a citizen requested a Shoreline Residential SED be assigned for a portion of APN 11702140600—the southernmost lakefront parcel on this reach—stating that it already contains human development, including existing paths (approx. 10 feet wide), existing cement block stairs (approx. 4 ft wide), existing hillside landscaping, and an existing dock.

The citizens have proposed that the reach boundary line be moved to envelop all areas of APN 11702140600 that are in residential use. Staff note that the SED assignment process in general has a strategy to align reach breaks with parcel lines, and avoid providing “sub-parcel” designations where possible, to avoid implementation challenges.

The Inventory and Characterization report discusses the approach taken to designate reach breaks relative to parcel lines:

During the creation of final reach breaks, an effort was made to place reach break points on parcel lines. This was done to avoid the potential for a parcel to contain more than one environmental designation. Due to the emphasis of placing reach break points on parcel lines, these locations do not always exactly line up with the locations of key environmental changes (e.g., topography might begin to change shortly before or after a reach break point). Breaks were located closest to the environmental change that was also on a parcel line. Despite this focus on parcel line reach break placement, there were some instances when a reach break was located mid-parcel because that was where the geographic change occurred (e.g., basin lines). This was particularly true when an environmental change occurred within a large parcel. (2013 report, page 13)

Parcel lines, SMP jurisdiction layer, and other layers can “shift” relative to the aerial image underneath, which can lead to confusion as planners attempt to discern which areas of a parcel are subject to which designation. When reach break lines follow the same basic shape of parcel lines, it can still be inferred whether the parcel boundary was intended to be the reach break.

The following tables provide a comparison of the existing condition of Reach LPA-7—LPA-8 (including the subject parcel) with the designation criteria for the Natural, Urban Conservancy and Shoreline Residential SEDs from the Thurston County SED Report,

alongside other information contained in the SED Report, Inventory & Characterization (I&C), county GeoData mapping, and other sources.

#### Natural SED

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity.	SED report lists this criteria for this reach.	<p>Yes. This reach appears to be mostly ecologically intact, based on the review performed. Conditions appear closer to natural, vs. degraded.</p> <p>The shoreline is heavily treed which provides a source of large woody debris recruitment.</p> <p>This reach is providing valuable functions for the larger aquatic and terrestrial environments which could be reduced by human development.</p>
Considered to represent ecosystems and geologic types that are of particular scientific and educational interest		None noted
Unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.	SED report lists this criteria for this reach	<p>Yes. This reach as a whole, and most of the subject parcel, appear to be relatively pristine. This would suggest a higher degree of function which could be vulnerable to adverse impacts from development.</p> <p>A portion of property is mapped with steep slopes which would bear further evaluation.</p>

Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats.	SED report lists this criteria for this reach	<p>Yes. Aerial photographs indicate a closed forest canopy and forested shoreline with large woody debris recruitment, which would suggest the shoreline is ecologically intact. However, staff have not been on site. Some shoreline vegetation clearing is visible on the southern parcel boundary.</p> <p>A portion of property is mapped with steep slopes which would bear further evaluation.</p>
Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation.	SED report lists this criteria for this reach	Yes. Shoreline configuration appears largely unmodified across entire reach. Some clearing and landscaping is visible on the southern edge of the subject parcel. A native Douglas fir overstory is visible from aerial photography for much of the subject parcel, though the condition of the understory is unknown.
Generally free of structural shoreline modifications, structures, and intensive human uses.	SED report lists this criteria for this reach	Yes. This reach is largely free of structural modifications, structures, and intensive human uses. Some clearing is present near the southern boundary of the subject parcel. A dock is present close to the parcel line/reach break. Otherwise, aerial photos do not provide indication that there is permanent modification to the property. The citizen stated a four-foot wide concrete staircase is present on the parcel. There is a force main from a septic system that enters SMP jurisdiction.

### Urban Conservancy SED

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Appropriate and planned for development compatible with maintaining or restoring ecological functions of the area, that lie in incorporated municipalities, urban growth areas, or commercial or industrial rural areas of more intense development AND at least one of the following:		<p>The subject area is within the Lacey urban growth area.</p> <p>Development may potentially occur outside shoreline and critical areas buffers, and subject to the MGSA zoning.</p>
Suitable for low-intensity water-dependent, water-related or water-enjoyment uses without significant adverse impacts to shoreline functions or processes		Majority of parcel appears to be in an undisturbed condition. If development does occur, low intensity uses may be the most appropriate in more intact portions of this parcel.
Open space, flood plain, or other sensitive areas that should not be more intensively developed		The southern third to half of the shoreline of this parcel is mapped with steep slopes, which would bear further investigation during land use permitting.
Potential for ecological restoration		Site appears largely intact from aerial photographs. Replanting could occur on southern parcel boundary in the future.



Retain important ecological functions, even though partially developed		Site has human uses but also appears to retain ecological function as evidence by general lack of development and extent of canopy coverage.
Potential for development that is compatible with ecological restoration		Restoration work potential on this parcel appears limited. Development in southern portion of parcel could be paired with additional shoreline plantings to re-establish buffer vegetation.
Does not meet the designation criteria for the Natural environment.		The subject parcel appears to meet several designation criteria for the Natural environment.

#### **Shoreline Residential SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Rural Conservancy: no – parcel is inside Lacey UGA  Natural: meets several criteria
Predominantly single-family or multifamily residential development or are planned and platted for residential development.		Property is adjacent to property with residential structures, under the same ownership. Parcel itself contains a septic drainfield but no primary residential structures.
Majority of the lot area is within the shoreline jurisdiction.		Hard to estimate. Parcel is 4 acres in size; there appears to be buildable area outside shoreline jurisdiction.
Ecological functions have been impacted by more intense modification and use.		Overall, this parcel appears to be relatively ecologically intact. Landowner has included information about 8-10' wide cleared paths on the property, but there is no

		indication these are permanent features. There is a force main from a septic system that enters SMP jurisdiction, and concrete stairs noted by the landowner. A dock and some shoreline vegetation clearing is visible on the southern parcel boundary.
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#### Conclusions:

The majority of APN 11702140600 appears to reflect the conditions present in the rest of Reach LPA-7—LPA-8 (with a proposed Natural SED). Although there are some modifications to the parcel noted by the landowner, the majority of the parcel appears to be in a relatively undisturbed condition. Residential development may occur in all SEDs, subject to standards. The Shoreline Residential SED is intended for intensely modified residential shorelines.

#### Staff Recommendation:

Staff recommends avoiding sub-parcel reach break changes if possible, to ease future implementation of the SMP and to be consistent with the approach used to designate most shorelines in an earlier phase of the SMP update. Placing a reach break inside this parcel, or providing a Shoreline Residential SED, does not appear to be warranted by the designation criteria, existing conditions or the general methodology used to propose SEDs for other County shorelines.

This parcel appears to best meet the criteria for the Natural SED, and therefore staff does not recommend changing the proposed SED for this parcel and reach.

## SED Review Analysis: Pattison Lake – LPA-2—LPA-3 & LPA-8—LPA-1



Fig. 1. General location of subject area in Reaches LPA-8—LPA-1 and LPA-2—LPA-3, circled in yellow.

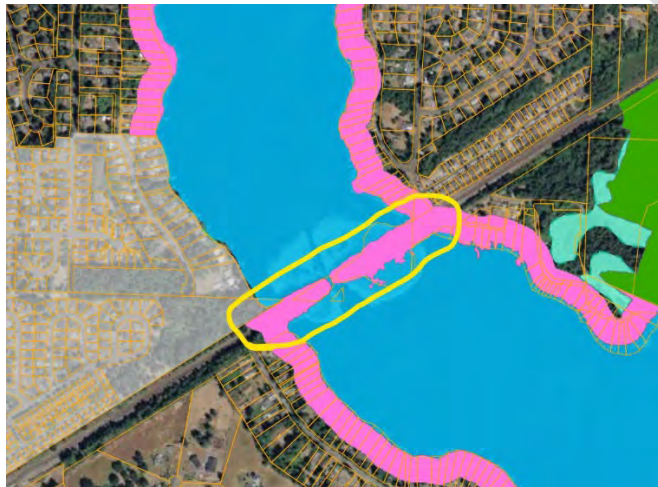


Fig. 2. Area in question with proposed SED shown.



Fig. 3. Zoomed in photograph of area in question.

Current SED: Rural

Proposed SED: Shoreline Residential

Citizen Request: Urban/Rural Conservancy

Staff Analysis:

This analysis is for portions of Reaches LPA-8—LPA-1 and LPA-2—LPA-3, which are located in the center of Pattison Lake where the lake is crossed by railroad tracks. During the recent public comment period, a citizen has stated that the proposed Shoreline Residential SED is inappropriate for this area, and that Urban or Rural Conservancy would be a better fit, based on the designation criteria.

The following tables provide a review of the Urban Conservancy and Shoreline Residential designation criteria from the Thurston County SED Report, alongside information from the SED Report, Inventory & Characterization (I&C), county GeoData mapping, and other sources.

#### **Urban Conservancy SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Appropriate and planned for development compatible with maintaining or restoring ecological functions of the area, that lie in incorporated municipalities, urban growth areas, or commercial or industrial rural areas of more intense development AND at least one of the following:		The area in question is inside the Lacey urban growth area.  Any development will likely be performed by the railroad industry and could potentially feature restoration so long as this does not impact railroad operations.
Suitable for low-intensity water-		Area may be suitable for water enjoyment as part of

dependent, water-related or water-enjoyment uses without significant adverse impacts to shoreline functions or processes		general boating access to Pattison Lake. May not suitable for more intense uses based on use in active railroad operations.
Open space, flood plain, or other sensitive areas that should not be more intensively developed		Area mapped with steep slopes, and partially in floodplain and mapped wetlands. Should not be more intensively developed due to proximity to active railroad operations.
Potential for ecological restoration		Potentially, given artificial nature of shoreline.
Retain important ecological functions, even though partially developed		May provide some habitat and source of woody debris, however the area consists of artificial fill and therefore may be impeding ecological functions in the lake.
Potential for development that is compatible with ecological restoration		Any development will be performed by the railroad industry and could potentially feature restoration so long as this does not impact railroad operations.
Does not meet the designation criteria for the Natural environment.		Does not meet the designation criteria for the Natural SED.

#### **Shoreline Residential SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Rural Conservancy: no  Natural: no
Predominantly single-family or multifamily	SED report includes this criterion for both reaches in question.	No - the area does not contain residential development, nor is it platted

residential development or are planned and platted for residential development.		for such. Area in question consists of artificial fill and active railroad tracks.
Majority of the lot area is within the shoreline jurisdiction.		Yes – majority of area is within shoreline jurisdiction. Area consists of railroad right-of-way and wetlands, not developable lots.
Ecological functions have been impacted by more intense modification and use.		Ecological functions of lake were originally impacted by installation of fill in 1890s.

#### Conclusions:

The methodology used to designate SEDs for this update generally assigned a Shoreline Residential SED for areas that were intensely modified by or planned for residential development and assigned a Natural SED for areas with high quality habitat or minimal modification. Shorelands upland of the Ordinary High Water Mark received an Urban or Rural Conservancy SED if they do not meet the criteria for Natural or Shoreline Residential.

The area in question appears to fit neither the Shoreline Residential nor Natural criteria but may have been designated Shoreline Residential because of its location within a larger area that met the criteria for Shoreline Residential. The area appears very different in character than surrounding areas with a proposed Shoreline Residential SED. However, other areas in the county where railroad lines cross shoreline jurisdiction have been designated the same as the surrounding area, and virtually all as Natural or Rural Conservancy. It is highly unlikely that residential development would occur in the area in question, given its active use as a rail corridor and the presence of wetlands.

#### Staff Recommendation:

Staff support two options: changing the proposed SED to Urban Conservancy to be consistent with the criteria, or keeping the proposed Shoreline Residential SED, which would be consistent with how other portions of the County's rail corridors were designated.



**SED Review Analysis: Lake St. Clair, Reach LSC-1—LSC-2 (APN 21829330300)**



*Fig. 1. General location of subject parcel, within Reach LSC-1—LSC-2, indicated by yellow arrow.*



*Fig. 2. Zoomed in aerial photograph of subject parcel.*

Current SED: Rural

Proposed SED: Natural

Citizen Request: Shoreline Residential

### Staff Analysis:

Reach LSC-1—LSC-2 of Lake St. Clair is located at the north end of the lake. During the recent public comment period, a citizen requested a Shoreline Residential SED be assigned for APN 21829330300, given that the parcel is now developed, and is adjacent to other properties with a Shoreline Residential SED.

The following tables provide a comparison of the existing condition of the subject parcel with the designation criteria for the Natural, Rural Conservancy and Shoreline Residential SEDs from the Thurston County SED Report, alongside other information contained in the SED Report, Inventory & Characterization (I&C), county GeoData mapping, and other sources.

#### **Natural SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity.	SED report lists this criterion for this reach	This parcel features residential development within approximately 60 feet of the shoreline (depicted on aerial photography), though alteration is mostly on the western half of the parcel. The eastern half of the parcel is less developed and retains significant canopy coverage. A gravel driveway is present along the length of the shoreline.
Considered to represent ecosystems and geologic types that are of particular scientific and educational interest	SED report lists this criterion for this reach	
Unable to support new development or uses without significant adverse impacts to ecological	SED report lists this criterion for this reach	This parcel has been developed since the inventory & characterization was performed. Ecological function does appear to remain in the eastern half of

functions or risk to human safety.		<p>the parcel, which could be impacted by further development.</p> <p>The parcel is mapped with steep slopes but to a lesser extent than surrounding parcels.</p>
Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats.	SED report lists this criterion for this reach	This parcel has been disturbed in the recent past by the construction of a single-family home and related appurtenances, though the eastern half of the parcel appears to be significantly more intact.
Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation.	SED report lists this criterion for this reach	Shoreline configuration appears largely natural, but significant vegetation removal has occurred to construct a single-family home and related appurtenances on a portion of the parcel.
Generally free of structural shoreline modifications, structures, and intensive human uses.	SED report lists this criterion for this reach	This is true for the remainder of Reach LSC-1—LSC-2, but the parcel in question has been developed since the inventory and characterization was performed. A portion of this parcel contains structures and intensive human uses.

#### **Rural Conservancy SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Outside incorporated municipalities and outside urban growth areas, AND		Yes, the parcel is outside cities and UGAs

at least one of the following:		
Currently supporting low-intensity resource based uses such as agriculture, forestry, or recreation.		No – supporting residential use
Currently accommodating residential uses		Yes
Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas		Yes – parcel supports residential use. The parcel is mapped with steep slopes but to a lesser extent than surrounding parcels.
Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes		Parcel is already supporting more intense use, which has likely impacted shoreline functions and processes. Low-intensity uses may be more appropriate for undeveloped portions within shoreline jurisdiction.
Private and/or publicly owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.		No – public access limited to individual private use.
Does not meet the designation criteria		Parcel does not appear to meet the criteria for the Natural SED.

for the Natural environment.		
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### **Shoreline Residential SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Rural Conservancy: meets some criteria  Natural: no
Predominantly single-family or multifamily residential development or are planned and platted for residential development.		Yes
Majority of the lot area is within the shoreline jurisdiction.		Yes
Ecological functions have been impacted by more intense modification and use.		A home and appurtenances have been constructed approximately 60-65 feet from the mapped shoreline of the lake. A gravel driveway parallels the shoreline approximately 150' from the mapped shoreline. However, the eastern portion of the parcel, and the shoreline between the home and the water, appear to be significantly less altered.

### **Conclusions:**

This parcel does not appear to meet the criteria for the Natural SED—it has been partially developed since the original SED report was written. Looking at a lakewide-scale, this parcel is more like other developed parcels than it is to other parcels in

Reach LSC-1—LSC-2. Though partially developed, this parcel appears to retain ecological function, specifically in the eastern half and in the shoreline area between the newly-constructed home and water. The parcel is also subject to environmental limitations, as evidenced by the presence of mapped steep slopes. There are entire reaches on Lake St. Clair that are of similar size to this parcel.

**Staff Recommendation:**

To reflect existing conditions and to be consistent with the requirement to achieve no net loss of ecological function, staff recommends a Rural Conservancy SED for this parcel. This is supported by the presence of ecological function and environmental limitations on a parcel that has been partially developed. This could be accomplished by creating a separate reach for this parcel, or by changing the designation and retaining the existing reach break location.



## SED Review Analysis: Deschutes River – DE-17—DE-18 – APN 09560002000

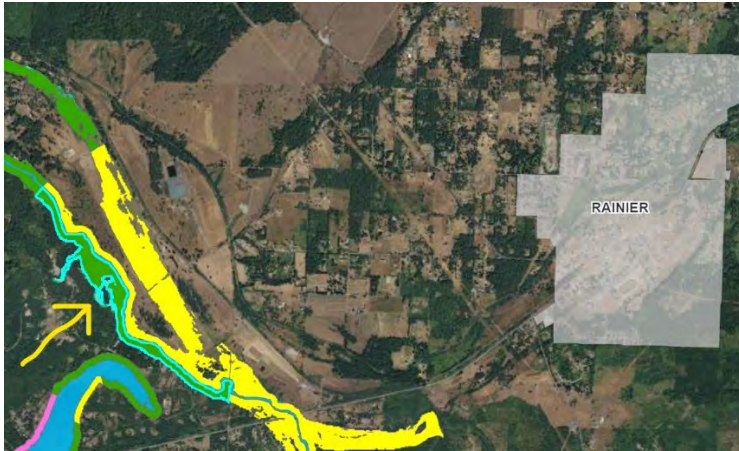


Fig. 1. General location of Reach DE-17—DE-18, indicated by yellow arrow.

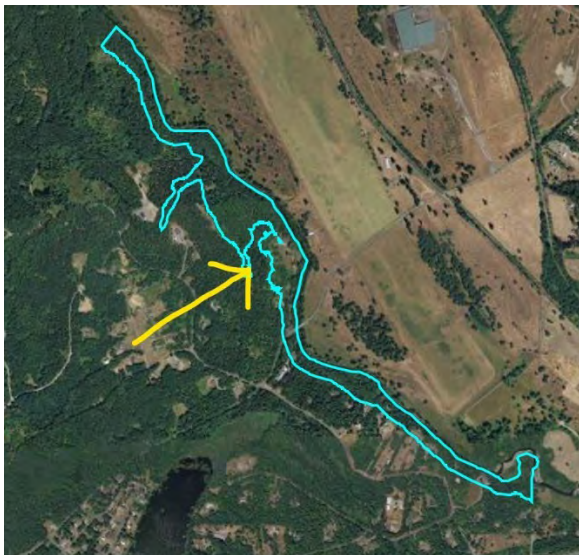
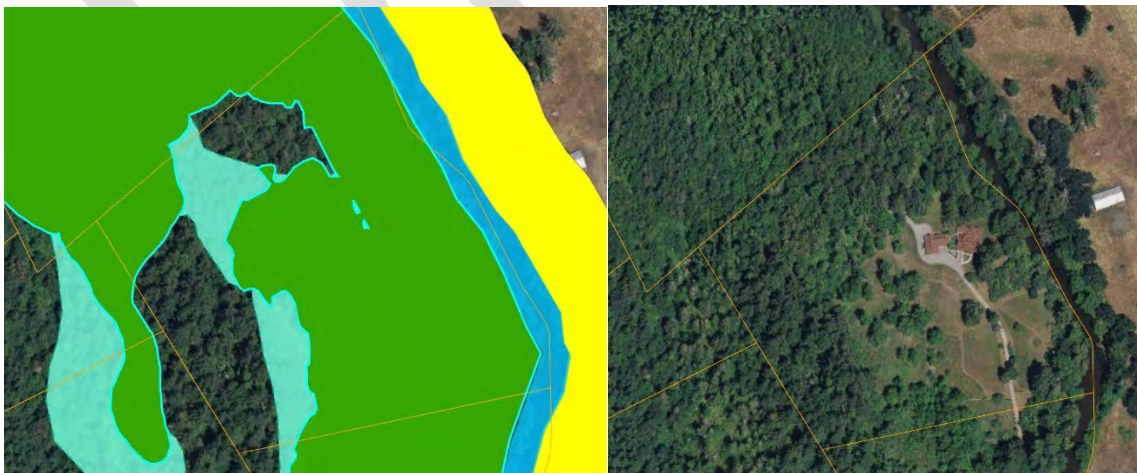


Fig. 2. Aerial view of Reach DE-17—DE-18 with subject parcel indicated by yellow arrow.



Figs. 3 & 4. Subject parcel with proposed SED (left), and aerial photograph (right).

Current SED: Conservancy

Proposed SED: Natural (left bank), Rural Conservancy (right bank)

Citizen Request: Shoreline Residential (for APN 09560002000, on the left bank)

Staff Analysis:

This reach of the Deschutes River, located between Tenino and Rainier, is identified as Reach DE-17—DE-18. This analysis will focus on the left bank of the river. During the recent public comment period, a citizen requested a Shoreline Residential SED be assigned for parcel 09560002000, stating “Shoreline Residential” seems a more appropriate designation, given the multiple single-family structures adjacent, upriver, and surrounding. Given this section of the river, historically, a portion of a Weyerhaeuser park, has always been a favored spot for steelhead and fly fishing and rafters, it seemingly falls under a different designation in many ways.

The citizen stated that the Natural SED was incorrect for their property, and that: “it is not “... free of structural shoreline modifications, structures, and intensive human uses.” It is “Currently accommodating residential uses.” As I stated previously there exist multiple single family residences since approximately 1924 ; a portion of the property was farmed (strawberries) and raised cattle; a portion was forested, once a Weyerhaeuser park and “Currently provides public access and recreational use where medium density and residential developments and services exist and are planned”. Shoreline Residential is the appropriate designation.

The following tables provide a comparison of the existing condition of the left bank of Reach DE-17—DE-18 (including the subject parcel) with the designation criteria for the Natural, Rural Conservancy and Shoreline Residential SEDs from the Thurston County SED Report, alongside other information contained in the SED Report, Inventory & Characterization (I&C), county GeoData mapping, and other sources.

#### **Natural SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide	I&C report matrix states: The Deschutes River is heavily forested on the left bank (SW) which shows no sign of development....	Portions of this reach appear ecologically intact within shoreline jurisdiction. Parcels at the north end of the reach have historically been logged, though not since at least the mid-1990s. The subject parcel has been modified

process that would be damaged by human activity.		within shoreline jurisdiction, to include a residential structure, driveway, and lawn within 200' of the river. The northeast corner of the subject parcel appears more ecologically intact.
Considered to represent ecosystems and geologic types that are of particular scientific and educational interest	<p>This criterion is listed in the SED report for this reach.</p> <p>The I&amp;C states that highest protection is the preferred management strategy for this reach (from Puget Sound Water Flow Characterization Management Strategies, Stanley et al., 2012)</p>	
Unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.		Development in fully forested areas could result in significant impacts to ecological function. Portions of the reach are mapped with wetlands, floodplains, and steep slopes, all of which would require review to assess human safety risks.
Includes largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats.	<p>This criterion is listed in the SED report for this reach.</p> <p>I&amp;C report matrix states: Reach may contain the following species: fall chinook, resident cutthroat, sea-run cutthroat, winter steelhead, coho salmon, wild turkey, elk. Reach may contain...wetlands and associated buffers...anadromous fish spawning and/or rearing habitat (coho, chinook, winter steelhead), elk overwintering habitat. A small stand of oak-</p>	Reach contains mapped floodplain and wetlands. Staff disagrees there is no sign of development on left bank. Many properties are developed with homes within shoreline jurisdiction. The shorelines are forested by varying degrees.

	conifer/woodland canopy forest is mapped just to the west of the eastern reach break. The entire extent of this reach is within the 100-year floodplain. The Deschutes River is heavily forested on the left bank (SW) which shows no sign of development....	
Retain the majority of their natural shoreline functions, as evidenced by shoreline configuration and the presence of native vegetation.	This criterion is listed in the SED report for this reach.	Shoreline configuration is largely intact, except for Military Rd. crossing. Native vegetation is present through much of reach, though some areas have been cleared and contain lawn or residential development. Majority of reach appears to be vegetated.
Generally free of structural shoreline modifications, structures, and intensive human uses.	This criterion is listed in the SED report for this reach.  I&C report matrix lists road/bridge and culvert at Military Rd. SE	Many properties feature residential development within shoreline jurisdiction. Some properties with homes within SMP jurisdiction appear to still contain significant shoreline vegetation.

#### **Rural Conservancy SED**

<b>SED Criteria from SED Report</b>	<b>Inventory &amp; Characterization/SED Report Information</b>	<b>Staff Analysis</b>
Outside incorporated municipalities and outside urban growth areas, AND at least one of the following:		Yes, outside both city and UGA boundaries.
Currently supporting low-intensity resource-based uses such as agriculture,	I&C report matrix lists the following land uses: residential, undeveloped, timber/forest land, agricultural	Mostly not. 2 parcels in north end of reach are Designated Forest Land, and 1 is in the Assessor's current use agriculture program.

forestry, or recreation.		
Currently accommodating residential uses		Yes. Predominant use for properties in this reach.
Supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, wetlands, flood plains or other flood prone areas		Yes – supporting residential uses in many areas, but properties may be subject to wetland, floodplain, and slope limitations.
Can support low-intensity water-dependent uses without significant adverse impacts to shoreline functions or processes		Development of this type may be best suited to avoid significant adverse impacts.
Private and/or publicly owned lands (upland areas landward of OHWM) of high recreational value or with valuable historic or cultural resources or potential for public access.	I&C report matrix lists Military Rd. SE as public access within this reach.	No. Land is privately owned with limited public access opportunities. No noted historic sites on this side of Deschutes River (Linklater Ranch located on right bank).
Does not meet the designation criteria for the Natural environment.		Majority of reach does not meet Natural SED criteria (however the undeveloped parcels in north end of reach do).

### Shoreline Residential SED

SED Criteria from SED Report	Inventory & Characterization/SED Report Information	Staff Analysis
Does not meet the criteria for the Natural or Rural Conservancy Environments.		Portions of this reach meet the Natural SED and other portions meet the Rural Conservancy SED.
Predominantly single-family or multifamily residential development or are planned and platted for residential development.		Many parcels have residential development but not all have homes within shoreline jurisdiction.
Majority of the lot area is within the shoreline jurisdiction.		Many properties in this reach do not meet this criterion.
Ecological functions have been impacted by more intense modification and use.		Most properties in this reach do not meet this criterion.

### Conclusions:

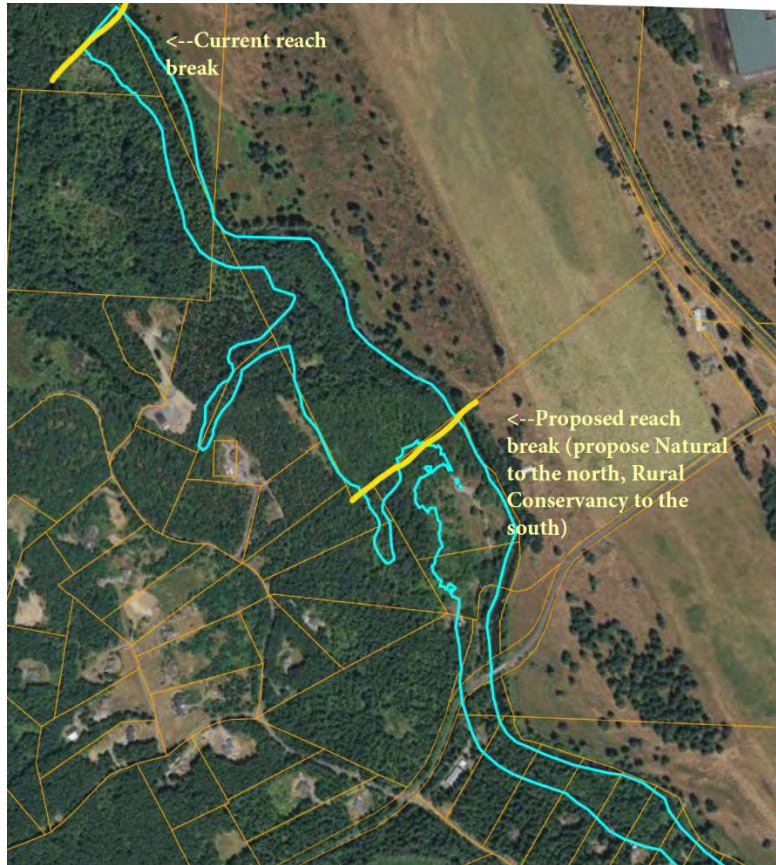
This reach appears to contain two different land use types (undeveloped land enrolled in Designated Forest Land current use in the north end, and partially developed residential parcels in the middle and south end). The undeveloped forestry parcels appear to reflect the criteria for the Natural SED, while the more developed parcels appear to best match Rural Conservancy criteria. Most parcels in this reach feature residential development, though not all parcels have residential structures located inside shoreline jurisdiction. The majority of parcels in this reach retain significant vegetation within shoreline jurisdiction. The subject parcel has residential development and vegetation modification within shoreline jurisdiction.

### Staff Recommendation:

Considering conditions across this reach, staff recommends moving the reach break at the north end of this reach south to the northern boundary of the subject parcel. This



would move the undeveloped forestry parcels in this reach into Reach DE-16—DE-17 and provide a Natural SED. Staff recommends the proposed SED for the remainder of Reach DE-17—DE-18 change from Natural to Rural Conservancy based on the existing conditions and criteria.



*Fig. 5. Proposed relocation of reach break DE-17. This proposal would provide Natural SED to forestry parcels in north end of current reach DE-17—DE-18, and a Rural Conservancy SED to parcels south of the relocated reach break.*