

Lewis County Community Development Staff Report: Findings, Conclusions and Recommendations for: Shoreline Substantial Development Permit (SHD26-0010)

Project Applicant: Barry Barney

Project Description: Conversion of an existing garage into an accessory dwelling unit. No new work is proposed on the ground, all work will be within the existing structure.

Project Location: The project is located at 452 Cispus Rd, Randle, Lewis County, WA – Section 21, Township 12 N, Range 07 E, WM

Project Parcel Number: 031921001000

Shoreline Stream: Siler Creek

Shoreline Environment: Shoreline Rural Conservancy

Comprehensive Plan Designation: Rural

Zoning Classification: Rural Development District – One residence per 10 acres (RDD-10)

Background Information:

The application was submitted on June 30, 2026 and determined complete to begin review on July 22, 2026. A Master Site Review (MSR26-0453) for critical areas and resource lands was conditionally approved on June 17, 2026.

Lewis County is Lead Agency for this proposal. The Shoreline Substantial Development Permit Application were routed internally to county departments and externally to federal, state and tribal agencies on July 28, 2026 to request comments.

The proposed project was reviewed under the Lewis County 2021 Shoreline Master Program and other applicable Lewis County Codes in effect at the time of complete application.

2021 Lewis County Shoreline Master Program Findings:

Applicability: The project is located within the Shoreline Jurisdiction of the Siler Creek and/or its associated wetlands. The 2021 Lewis County Shoreline Master Program applies to this project.

Shoreline Jurisdiction: Yes; Shoreline Rural Conservancy

Shoreline of Statewide Significance: No

Shoreline Environment Designations:

Shoreline Rural Conservancy Management Policies:

1. Uses in the Rural Conservancy shoreline environment designation should include those that sustain the shoreline area's physical and biological resource and do not substantially degrade ecological functions or the rural or natural character of the shoreline area.
2. Water-dependent and water-enjoyment recreation facilities that do not deplete the resource over time, such as boating and water access facilities, angling, hunting, wildlife viewing trails, and swimming beaches, are preferred uses, provided significant adverse impacts to the shoreline are mitigated.
3. Agricultural, aquaculture, forest practices, and low-intensity residential development when consistent with provisions of the SMP are preferred uses.
4. Low-intensity, water-oriented commercial and industrial uses are limited to areas where those uses have located in the past or at sites that possess conditions and services to support the development.
5. Mining and related uses may be appropriate within the rural conservancy environment when conducted in a manner consistent with the environment policies and provisions of WAC 173-206-241(3)(h) and when located consistent with mineral resource lands designation criteria in accordance with RCW 36.70A.170 and WAC 365-190-070.
6. Developments and uses that would substantially degrade or permanently deplete the biological resources of the area should not be allowed.
7. Construction of new structural shoreline stabilization and flood control works should be allowed when the documented need exists to protect an existing primary structure or ecological functions. Mitigation may be necessary for such construction. New development should be designed and located to preclude the need for such work. Shoreline stabilization measures shall infringe on private property to the minimum extent necessary.
8. Proposed residential development should be designed to ensure no net loss of shoreline ecological functions and preserve the existing character of the shoreline.

Staff Response: The project is located in the Shoreline Rural Conservancy and consists of an Accessory Dwelling Unit within an pole building for residential use. The project does not propose any exterior groundwork. As proposed, the project meets the applicable policies.

General Regulations:

Environmental Impacts and Mitigation:

Regulations:

- A. The environmental impacts of development proposals shall be analyzed and include measures to mitigate environmental impacts not otherwise avoided or mitigated by compliance with the SMP and other applicable regulations.
- B. Mitigation measures shall be considered and applied in the following sequence of steps, listed in order of priority:
 - 1. Avoiding the impact altogether by not taking a certain action or parts of an action;
 - 2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;
 - 3. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
 - 4. Reducing or eliminating the impact over time by preservation and maintenance operations;
 - 5. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and
 - 6. Monitoring the impact and the compensation projects and taking appropriate corrective measures.
- C. In determining appropriate mitigation measures applicable to development in shoreline jurisdiction, lower priority measures should be applied only where higher priority measures are determined to be infeasible or inapplicable.
- D. Mitigation shall not be required that exceeds what is necessary to assure the development will result in no net loss of ecological functions in shoreline jurisdiction.
- E. When compensatory measures are appropriate pursuant to the mitigation priority sequence above, preferential consideration shall be given to measures that replace the impacted functions directly and in the immediate vicinity of the impact. However, alternative compensatory mitigation measures that have been identified within a watershed plan, and address limiting factors or other critical resource conservation needs in the shoreline jurisdiction may be authorized. Authorization of compensatory mitigation measures may require appropriate safeguards, terms, or conditions as necessary to ensure no net loss of ecological functions.

Staff Response: The current proposal does not include any new ground disturbance or exterior work. As proposed, the project meets the applicable policies.

Critical Areas and Shoreline Vegetation Conservation:

Regulations:

- A. Critical Areas Ordinance Adopted and Modified.
 - 1. Whether or not a shoreline permit or written statement of exemption is required, the provisions of this section shall apply to all uses, alterations, or

developments within shoreline jurisdiction or shoreline buffers. All shoreline uses and activities shall be located, designed, constructed, and managed to protect the ecological functions and ecosystem wide processes provided by critical areas and shoreline vegetation.

Staff Response: The proposal is a conversion of an pole building into an Accessory Dwelling Unit, no exterior ground disturbance or work is proposed. As proposed, the project meets these regulations.

B. Shoreline Buffers.

1. The required critical area buffers for Type S streams, as established in SMP Table 4-1: Shoreline Buffers, shall be considered the shoreline buffers.
4. New uses and development that are not water-dependent, water-related, or water-enjoyment, accessory to water-dependent, water-related, or water-enjoyment uses or development, or that do not facilitate public access to waters of the State generally will not be authorized in shoreline buffers. Some uses or developments not meeting the criteria above may be authorized through buffer averaging or through issuance of a shoreline variance.
5. SMP Table 4-1: Shoreline Buffers establishes shoreline buffers by shoreline environment designation.
9. Building setbacks of 16 feet are required from the landward edge of the shoreline buffer in accordance with LCC 17.38.1010. Building setbacks are used to protect the shoreline buffer from disturbance during construction and from the impacts related to use of a structure. Where no shoreline buffer is required in Table 4-1, no building setback shall be required.

Staff Response: Table 4-1 lists residential development as having a 150-foot buffer. The proposed conversion approximately 480 feet from the OHWM of Siler Creek. The shoreline jurisdiction extends to this lot based on mapped wetlands. The proposal is located within an existing structure and no work is proposed to the exterior of the structure or the ground. As proposed, the project meets these regulations.

Flood Hazard Management:
Regulations:

- A. All proposed flood hazard management measures shall comply with the County's Comprehensive Flood Hazard Management Plan.
- B. Development in floodplains shall not increase flood hazards.
- C. No development is allowed within the SMP flood course or floodway in shoreline jurisdiction, unless a hydraulics and hydrology study shows that it is:
 1. Not in a SMP flood course or floodway; or
 2. Will not impact the pre-project base flood elevations, floodway elevations, or floodway data widths.

- D. Within the CMZ, SMP flood course or floodway, new development or uses, including subdivision of land, shall not be established when it would be reasonably foreseeable that the development or use would require new structural flood hazard reduction measures.
- E. New development within floodways, the SMP flood course, and the CMZ shall not interfere with the process of channel migration or cause a net loss of ecological functions. If existing CMZ studies are not available for an area of known channel migration, a site analysis may be required to ensure that development does not interfere with the process of channel migration. Areas of known channel migration are shown in the SMP Map Folio Figure 28 in the Shoreline Inventory and Characterization.
- F. Development in the CMZ, SMP flood course, and floodways, is limited to:
 - 1. Actions that protect or restore ecosystem-wide processes or ecological functions;
 - 2. Forest practices in compliance with the FPA;
 - 3. Existing and ongoing agricultural practices, provided no new restrictions to channel movement occur;
 - 4. Mining uses conducted consistent with the shoreline environment designation and the provisions of WAC 173-26-241(3)(h);
 - 5. Bridges, utility lines, and other public utility and transportation structures where no other feasible alternative exists or the alternative would result in an unreasonable and disproportionate cost;
 - 6. Repair and maintenance of an existing legal use, provided that the repair and maintenance does not cause significant ecological impacts or increase flood hazards to other uses;
 - 7. Modifications or additions to an existing nonagricultural legal use, provided that channel migration is not further limited and that the new development includes appropriate protection of ecological functions;
 - 8. Development in UGAs, as defined in Chapter 36.70A RCW, where existing structures prevent active channel movement and flooding; or
 - 9. Measures to reduce shoreline erosion, if it is demonstrated that the erosion rate exceeds that which would normally occur in a natural condition, the measure does not interfere with fluvial hydrological and geomorphological processes normally acting in natural conditions, and the measure includes appropriate mitigation of impacts to ecological functions associated with the river or stream.
- G. New structural flood hazard management measures may be permitted if consistent with applicable provisions in SMP Chapter 6: Shoreline Modification Policies & Regulations.
- H. New publicly-funded structural flood hazard management measures, including dikes and levees, shall dedicate and improve public access except in those instances as listed in SMP Section 4.06.02(B).
- I. Removal of gravel for flood management purposes shall be permitted only after a biological and geomorphological study demonstrates that the extraction:

1. Provides a long-term benefit to flood hazard management;
2. Does not result in a net loss of ecological functions; and
3. It is part of a comprehensive flood management solution.

Staff Response: The proposed conversion is not located in a flood zone or CMZ. The regulations have been met.

Public Access:

Regulations:

- A. Shoreline public access shall be required for the following shoreline developments and uses:
 1. Shoreline recreation in accordance with SMP Section 5.13;
 2. New structural public flood hazard reduction measures, such as dikes and levees;
 3. Shoreline development by public entities, including the County, port districts, State agencies, and public utility districts;
 4. New marinas when water-enjoyment uses are associated with the marina; and
 5. All other development and use types that are required to incorporate shoreline public access as identified in the SMP, or other State or Federal requirements.

Staff Response: The proposed project is an ADU associated with an existing single-family residence and does not require public access. The regulations have been met.

Specific Shoreline Use Regulations:

General Shoreline Use:

Regulations:

- A. Use and development standards shall not apply retroactively to existing, legally established structures, or uses and developments in place at the time of the adoption of the SMP update. Existing structures, uses and developments, including residential appurtenances, may be maintained, repaired, and operated within shoreline jurisdiction and the shoreline buffers established in the SMP.
- B. Development shall comply with the most restrictive bulk and dimensional requirements in LCC Title 17 or SMP Section 5.04.
- C. Accessory uses, such as parking, stormwater management facilities, and utilities shall be located outside of shoreline and critical area buffers, and associated building setbacks, unless authorized in SMP Section 4.04.02(D) .
- D. Shoreline uses and developments shall be designed to complement the setting of the property and minimize glare. Shoreline applicants shall demonstrate efforts to minimize potential impacts to the extent feasible.

Staff Response: The project is a residential use within the footprint of an existing pole building. As proposed, the project meets these regulations.

Allowed Shoreline Uses:

Staff Response: Table 5-1 lists residential development as a permitted use in the Shoreline Rural Conservancy Environment. As proposed, the project meets these regulations.

Residential Development:

Regulations:

- A. Residential uses and development may be allowed in conformance with the development requirements of the County and the provisions of the SMP.
- C. Each residential structure, including accessory and appurtenant structures and uses, shall:
 - 1. Comply with all applicable zoning regulations.
 - 2. Meet all applicable critical areas, vegetation conservation, and water quality standards of SMP Chapter 4: General Policies & Regulations.
 - 3. Be designed, sited, and constructed to:
 - a. Assure no net loss of shoreline ecological function.
 - b. Prevent the need for new structural flood hazard management measure to the greatest extend feasible.
 - c. Be sufficiently set back from steep slopes and shorelines vulnerable to erosion, in accordance with the required critical area and shoreline buffers, to ensure that structural improvements and stabilization structures are not necessary to protect such structures and uses.
- E. The primary residential use on any lot shall be established prior to any accessory or appurtenant structures.
- F. Accessory and appurtenant developments and structures shall be subject to the same regulations as the primary residence. Provided that septic systems, drainfields and other accessory or appurtenant developments may be located within a critical area or shoreline buffer when no other option exists, and the proposal meets the requirements in Section 4.04.02(D).
- H. Residential accessory and appurtenant structures and uses shall be prohibited over the water, unless clearly water-dependent.

Staff Response: The proposed ADU is accessory to a legally permitted single family residence. As proposed, the project meets these regulations.

Shoreline Modification Regulations:

Clearing, Grading and Fill:

Regulations:

- A. Clearing, grading, and the placement of fill shall be minimized to the extent feasible and only allowed when necessary to accommodate an approved shoreline use or development.
- B. All clearing, grading, and the placement of fill shall be located, designed, and constructed to protect shoreline ecological functions and ecosystem-wide processes, including channel migration.
- C. Speculative clearing, grading, and the placement of fill are prohibited.
- D. When clearing, grading, or the placement of fill will cause adverse impacts to ecological functions, a mitigation plan, prepared by a qualified professional, must be completed consistent with the provisions of SMP Section 4.04.
- E. Clearing, grading, and the placement of fill within wetlands, floodways, or CMZs, and/or the placement of fill waterward of the OHWM, is only allowed when:
 - 1. Due consideration has been given to the site specific conditions;
 - 2. All impacts have been mitigated;
 - 3. All required State and Federal permits, and necessary approvals from WDNR for State-owned aquatic lands, have been obtained; and
 - 4. The shoreline use or development is one of the following:
 - a. A water-dependent use or public access to the shoreline;
 - b. The cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan;
 - c. The disposal of dredged material considered suitable under, and conducted in accordance with, the WDNR's Dredged Material Management Program and the United States Army Corps of Engineers' (USACE) Dredged Material Management Office. See also SMP Section 6.04;
 - d. The expansion or alteration of transportation facilities of statewide significance that are currently located in the shoreline, where alternatives to fill are infeasible;
 - e. Ecological enhancement, restoration or mitigation, when consistent with an approved plan; or
 - f. The protection of historic or cultural resources when fill is the most feasible method to avoid continued degradation, disturbance, or erosion of a site. Such fill must be coordinated with any affected tribes and comply with applicable provisions of SMP Section 4.02.
- F. Upland clearing, grading and the placement of fill outside of wetlands, floodways, and CMZs is permitted provided it:
 - 1. Is the minimum necessary to implement the approved use or modification;
 - 2. Does not significantly change the topography of the landscape in a manner that affects hydrology or increases the risk of slope failure, consistent with the applicable provisions of SMP Section 4.04; and
 - 3. Is conducted outside required shoreline buffers, unless specifically authorized by the SMP, or is necessary to provide protection to historic or cultural resources.

- G. Grading, the placement of fill, and beach nourishment shall be designed to blend physically and visually with the existing topography whenever feasible, so as not to interfere with lawful access and enjoyment of scenery.
- H. Clearing, grading, and the placement of fill shall not be located where shoreline stabilization will be necessary to protect the materials placed or removed, except when part of an approved plan for the protection of historic or cultural resources, or as part of an approved environmental cleanup plan or project.
- I. Cut and fill slopes shall generally be sloped no steeper than one foot vertical for every two feet horizontal (1:2) unless a specific engineering analysis has been provided that demonstrates the stability of a steeper slope.
- J. A temporary erosion and sediment control plan, including BMPs, consistent with the County's stormwater manual, shall be submitted to and approved by the Shoreline Administrator prior to commencement of all clearing, grading, and fill activities.
- K. To prevent a loss of flood storage, compensatory storage shall be provided commensurate with the amount of fill placed in the floodway per SMP Section 4.05.
- L. The placement of fill on State-owned aquatic lands must comply with WDNR and WDFW standards and regulations.

Staff Response: No filling or grading is proposed for the ADU. As proposed, the project meets these regulations.

Staff Report Conclusions:

After review of the shoreline permit application, its drawings, designs, reports, studies and mitigation plans, the following are staff conclusions regarding the proposed project.

The project is in compliance with the State Environmental Policy Act, the Lewis County Code (LCC) Chapter 17.38 (Critical Areas) and the applicable elements of the 2021 Lewis County Shoreline Master Program.

Shoreline Permit Recommendation:

Staff recommendation is to approve the shoreline substantial development permit with appropriate conditions citing specific regulations from the above referenced master program elements.