

Pacific County Shoreline Master Program

Consistency Analysis Report

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1. Introduction

In accordance with the Washington State Shoreline Management Act (SMA), local jurisdictions with “Shorelines of the State” are required to conduct a periodic review of their Shoreline Master Programs (SMPs) (Washington Administrative Code [WAC] 173-26-090). The periodic review is intended to keep SMPs current with amendments to state laws, changes to local plans and regulations, and provide clarifications to existing code to improve functionality and clarity.

Shoreline jurisdiction in Pacific County (County) includes marine and freshwater shorelines (lakes and streams) listed in Section 3.1 of the County’s Shoreline Master Program (2017). The Pacific Ocean and Willapa Bay are designated as shorelines of statewide significance.

The Department of Community Development (DCD) manages the Pacific County SMP. The most recent comprehensive update of the SMP was adopted December 12, 2017 (Ord. 183). The goals and policies of the SMP are located in Pacific County Ordinance No. 183 in accordance with RCW 36.70A.480.

The County’s 2016 Critical Areas and Resource Lands Ordinance (CARL) update (Ord.180, adopted August 23, 2016) ran concurrently with the 2017 SMP update and was adopted by ordinance within the SMP.

As a first step in the periodic review process, the County’s current SMP was reviewed by staff and the County’s consultant, The Watershed Company. The purpose of this Consistency Analysis Report is to provide a summary of the review and identify potential areas of the SMP needing amendment with input from County staff. This report is organized into the following sections:

- **Section 2** identifies gaps the SMP may have in consistency with state laws. This analysis is based on a list of amendments between 2007 and 2021 as summarized by the Washington State Department of Ecology (Ecology) Periodic Review Checklist.
- **Section 3** identifies sections in the SMP that need to be reviewed and potentially updated to be consistent with current critical areas and resource lands regulations (Ordinance 180A) and Ecology’s updated guidance. Select sections of Ordinance 180 are incorporated by reference into the current SMP.
- **Section 4** identifies potential gaps in consistency with the County’s Comprehensive Plan and with implementing sections of the County’s development regulations, other than critical areas regulations that are addressed in Section 3.

- **Section 5** identifies other issues to consider as part of the periodic update process to produce a more effective SMP, including those issues identified by planning staff since implementation of the 2017 SMP.

This report includes several tables that identify potential revision actions. Where potential revision actions are identified, they are classified as follows:

- **“Mandatory”** indicates revisions that are required for consistency with state laws.
- **“Recommended”** indicates revisions that would improve consistency with state laws but are not strictly required.
- **“Optional”** indicates legislative amendments or updated Ecology guidance can be adopted at the County’s preference but are not required.
- **“No action necessary”** indicates the current SMP meets the intent of or already contains listed legislative updates and changes to the critical areas and resource lands ordinance, the comprehensive plan, or zoning codes.

This document attempts to minimize the use of abbreviations; however, a select few are used to keep the document concise. These abbreviations are found below in Table 1-1.

Table 1-1. Abbreviations used in this document.

Abbreviation	Meaning
BAS	Best Available Science
CARL	Critical Areas and Resource Lands Ordinance
County	Pacific County
DCD	Department of Community Development
Ecology	Washington State Department of Ecology
GMA	Growth Management Act
RCW	Revised Code of Washington
SMA	Shoreline Management Act
SMP	Shoreline Master Program
SED	Shoreline Environment Designations
SDP	Shoreline Substantial Development Permit
WAC	Washington Administrative Code

2. Consistency with Legislative Amendments

Table 2-1 summarizes potential revisions to the County’s SMP based on a review of consistency with amendments to state laws identified in the Periodic Review Checklist provided by Ecology. Topics are organized chronologically by year.

The 2017 update of the SMP is essentially consistent with state law, with only one mandatory revision identified. However, several areas are noted as recommended or optional potential amendments. In general, the potential revisions identified in the Periodic Review Checklist are minor in nature. They primarily concern revisions to cost thresholds, definitions, and administrative procedures.

Table 2-1. Summary of consistency with amendments to state laws and potential revisions.

Row	Summary of change	Review	Department Recommendation
2021			
a.	The Legislature amended floating on-water residence provisions	<p>The SMP does not contain a definition for floating on-water residences (FOWRs) (i.e. liveaboards). Liveaboards are regulated under SMP Section 5.6, Boating Facilities and Mooring Structures and not SMP Section 5.19, Residential Development.</p> <p>The SMP could benefit from a clear definition of FOWRs and updated regulations in SMP Section 5.6 to be consistent with legislative rules.</p> <p>The legislature amended the definition of FOWRs to include the term “vessel.” It also clarified that a Substantial Development Permit is required when replacing or remodeling a FOWR if the size of the existing residence is materially exceeded. The law also requires all replacement FOWRs and remodels which add 120 square feet or more to the living space to include on-board gray-water containment or a waste-water connection that disposes of the gray water to a waste-water disposal system.</p>	<p>Mandatory: Include provisions that if a FOWR is replaced or remodeled with an additional 120 square feet of living space, it includes on-board gray-water containment or a waste-water connection that disposes of the gray water to a waste-water disposal system.</p> <p>Recommended: Include a definition for liveaboards (i.e. floating on-water residences).</p>
b.	The Legislature clarified the permit exemption for fish passage projects	SMP Section 8.8.A(1), Exemptions and Developments Not Subject to the Act, already captures this amendment	No action necessary.

Row	Summary of change	Review	Department Recommendation
		through a direct reference to the updated law via WAC 173-27-040(2).	
2019			
a.	Washington State Office of Financial Management (OFM) adjusted the cost threshold for building freshwater docks	In addition to the general Shoreline Substantial Development Permit (SDP) cost threshold (see item 2017a below), the SMA includes a separate dollar threshold when freshwater docks trigger an SDP. The SMP does not include an absolute number but relies on reference to WAC 173-26-040 per SMP Section 8.8, Exemptions and Developments Not Subject to the Act.	No action necessary.
b.	The Legislature removed the requirement for a shoreline permit for disposal of dredged materials at Dredged Material Management Program sites (<i>applies to 9 jurisdictions</i>)	No Dredged Material Management Program sites are located within Pacific County's shoreline jurisdiction. The legislative amendment does not apply.	No action necessary.
2017			
SMP Adopted December 12, 2017 (Ord. 180)			
a.	OFM adjusted the cost threshold for substantial development to \$7,047.	SMP Section 2 'Substantial Development' references an up-to-date dollar figure and includes reference to inflation adjustments by the office of financial management every five years.	No action necessary.
b.	Ecology permit rules clarified the definition of "development" to not include dismantling or removing structures, consistent with 1992 case law.	SMP Section 2 'Development' does not capture the legislative update.	Recommended: The County should consider amending the definition of 'Development' with Ecology's recommended language: <i>"Development" does not include dismantling or removing structures if there is no other associated development or re-development.</i>

Row	Summary of change	Review	Department Recommendation
c.	Ecology adopted a new rule consolidating exceptions to local review under the SMA found in other laws.	The SMP already addresses exceptions to local review under WAC 173-27-044 and -045 per SMP Section 8.8, Exemptions and Developments Not Subject to the Act.	No action necessary.
d.	Ecology amended rules clarifying permit filing procedures consistent with a 2011 statute.	The SMP does not reference the permit filing process nor is it required to do so. The County is required to follow WAC 173-27-044 for permit filing procedures.	No action necessary.
e.	Ecology amended forestry use regulations to clarify that forest practices that only involve timber cutting are not SMA “developments” and do not require SDPs.	SMP Section 5.12, Forest Practices, states that forest practices that do not meet the definition of development in SMP Section 2 shall be conducted in accordance with RCW 76.09, WAC 222, and the 1999 Forest and Fish Report. However, the Forest Practices section does not explicitly match Ecology’s amendment.	Recommended: The County should consider amending SMP section 5.12, Forest Practices, to include the following statement: A forest practice that only involves timber cutting is not a development under the act and does not require a shoreline substantial development permit or a shoreline exemption. A forest practice that includes activities other than timber cutting, such as building roads and trails and placing culverts, may be a development under the act and may require a substantial development permit, as required by WAC 222-50-020
f.	Ecology clarified the SMA does not apply to lands under exclusive federal jurisdiction	SMP Section 1.2 states the applicability of the SMP to within the shoreline jurisdiction but does not clarify federal lands are SMA exempt.	Recommended: The County contains federally owned shoreline. Add the following language to Section 1.2, Applicability: C. Lands Under Exclusive Federal Jurisdiction. Areas and uses in those areas that are under exclusive Federal jurisdiction as established through federal or state statutes are not subject to

Row	Summary of change	Review	Department Recommendation
			Chapter 90.58 RCW or the SMP.
g.	Ecology clarified “default” provisions for nonconforming uses and development .	The SMP includes tailored provisions for nonconforming uses and development. However, the SMP combines nonconforming uses and developments into one definition.	Optional: Although not explicitly required since the County previously developed tailored provisions for nonconforming uses and developments, the County could consider creating separate definitions for nonconforming uses and nonconforming structures.
h.	Ecology adopted rule amendments to clarify the scope and process for conducting periodic reviews .	The SMP includes reference to the periodic review timeline and process in SMP Section 8.11.D. However, the SMP does not describe the periodic review scope or procedure in detail.	Optional: Although not explicitly required, the County may consider including a reference to WAC 173-26-090, Locally initiated review—Periodic review—Public involvement and approval procedures, in SMP section 8.11.D, to provide clarity regarding the periodic review process.
i.	Ecology adopted a new rule creating an optional SMP amendment process that allows for a shared local/state public comment period.	The SMP references soliciting both public and agency comments but does not explicitly state that these processes can occur concurrently. However, the SMP does not create any impediments to a shared local/state public comment period.	Optional: Although not explicitly required, the County may consider including a reference to WAC 173-26-104, Optional joint review process for amending shoreline master programs, in SMP section 8.11.B, to acknowledge the possible use of a joint review process.
j.	Submittal to Ecology of proposed SMP amendments.	SMP Section 8.11(B) generally describes the amendment process and criteria but could be enhanced for consistency with WAC 173-26-110, Submittal to department of proposed master programs/amendments.	Recommended: Update SMP section 8.11(B) to clarify that the submittal should include a summary of amendments made in response to public comments, and that local governments will submit their final periodic review checklist when taking action on the periodic review.

Row	Summary of change	Review	Department Recommendation
2016			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing structures to comply with the Americans with Disabilities Act (ADA) .	The SMP does not spell out all the statutory exemptions. Instead, it references WAC 173-26-040 per SMP Section 8.8, Exemptions and Developments Not Subject to the Act.	No action necessary.
b.	Ecology updated wetlands critical areas guidance including implementation guidance for the 2014 wetlands rating system.	The SMP was adopted in December 2017 and references the 2017 updated CARL which includes use of the 2014 wetland rating system.	No action necessary.
2015			
a.	The Legislature adopted a 90-day target for local review of Washington State Department of Transportation (WSDOT) projects.	The SMP does not address the review of WSDOT projects. While this is optional, the WSDOT presence is significant with several state highways within shoreline jurisdiction.	Recommended: The County should consider adding a section on special procedures for WSDOT projects to Chapter 8: Administration.
2014			
a.	The Legislature created a new definition and policy for floating on-water residences (FOWRs) legally established before 7/1/2014.	<p>The SMP does not contain a definition for floating on-water residences (FOWRs) (i.e. liveaboards). Liveaboards are regulated under SMP Section 5.6, Boating Facilities and Mooring Structures and not SMP Section 5.19, Residential Development.</p> <p>The SMP could benefit from a clear definition of FOWRs (i.e. liveaboards).</p>	Recommended: See Legislative Amendment 2021a above for response.
2012			
a.	The Legislature amended the SMA to clarify SMP appeal procedures .	The SMP already contains reference to the appeal procedures per WAC 173-26-130.	No action necessary.
2011			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved	The CARL (2016), adopted by reference in the SMP, incorporates the approved	No action necessary.

Row	Summary of change	Review	Department Recommendation
	federal wetland delineation manual.	federal wetland delineation manual.	
b.	Ecology adopted rules for new commercial geoduck aquaculture .	The SMP's definitions, siting considerations, and permit requirements for geoduck aquaculture are in compliance.	No action necessary.
c.	The Legislature created a new definition and policy for floating homes permitted or legally established prior to January 1, 2011.	SMP Section 5.19.11(d) prohibits new floating homes and provides regulations for existing floating homes.	No action necessary.
d.	The Legislature authorized a new option to classify existing residential structures as conforming.	SMP Section 7.2(B) classifies pre-existing single-family residential structures established at the time of publication are considered conforming.	No action necessary.
2010			
a.	The Legislature adopted Growth Management Act – Shoreline Management Act clarifications and amended the effective date for SMP amendments.	SMP Section 1.8 references the “effective date” of SMP amendments to be effective 14 days from Ecology’s written notice of final approval, which is in compliance.	No action necessary.
2009			
a.	The Legislature created new “relief” procedures for instances in which a shoreline restoration project within a UGA creates a shift in Ordinary High Water Mark.	The SMP does not include regulatory criteria for relief or reference to WAC 173-27-215. However, this provision is optional and may be used even if not present in the SMP.	Optional: Consider adopting Ecology rule by reference: “Pacific County may grant relief from shoreline master program development standards and use regulations resulting from shoreline restoration projects within urban growth areas consistent with criteria and procedures in WAC 173-27-215.”
b.	Ecology adopted a rule for certifying wetland mitigation banks .	The SMP does not reference mitigation banking, but CARL section 4(F) allows it.	No action necessary.
c.	The Legislature added moratoria authority and procedures to the SMA.	Moratoria procedures are not required in the SMP and the County may rely on WAC 173-27-085, if they choose to use moratoria provisions.	No action necessary.

Row	Summary of change	Review	Department Recommendation
2007			
a.	The Legislature clarified options for defining " floodway " as either the area that has been established in FEMA maps, or the floodway criteria set in the SMA.	SMP section 2 definition for "floodway" is in compliance.	No action necessary.
b.	Ecology amended rules to clarify that comprehensively updated SMPs shall include a list and map of streams and lakes in shoreline jurisdiction.	SMP Section 3.4(A) references "Official Shoreline Maps," a document containing maps of all shoreline designations dated September 2016. SMP Section 3.1(B) lists all streams, lakes, and marine areas in shoreline jurisdiction.	No action necessary.
c.	Ecology's rule listing statutory exemptions from the requirement for an SDP was amended to include fish habitat enhancement projects that conform to the provisions of RCW 77.55.181.	SMP section 8.8(A)1 references the relevant Ecology WAC statute. The SMP Section 8.8, Exemptions and Developments Not Subject to the Act, references the list of exemptions in WAC 173-26-040.	No action necessary.

3. Critical Areas Regulations Consistency Analysis

As noted above, the current SMP incorporated by reference certain provisions of the County's Critical Areas and Resource Lands Ordinance (CARL) (Ord. 180, dated August 23, 2016) that were in effect during the 2017 SMP update to regulate critical areas in shoreline jurisdiction. During this SMP periodic review, it is thus necessary to determine whether and how to further integrate and the 2019 CARL update provisions (Ord. 180A, dated December 30, 2019) in the SMP. A complex approach is to craft new regulations for the critical areas within the SMP regulations itself. A simple approach is to adopt the most recent CARL by reference in the SMP. Both options must satisfy the SMA's no net loss requirements. Table 3-1 summarizes potential updates to the SMP related to critical areas regulations.

Table 3-1. Consistency Review of County SMP and CARL listing potential revisions.

#	Issue	Review	Department Recommendation
1	SMP currently references an older version of the CARL	SMP 4.2.B(2) adopts by ordinance the former Critical Area and Resource Lands regulations in Ord. 180, dated August 23, 2016.	Recommended: Update the cross reference to reference Ordinance 180A, dated December 30, 2019, provided all provisions meet the SMA's no net loss standard.
2	July 2018 Ecology Wetland Buffer Guidance Update	Ecology updated their wetland rating guidance in July 2018. Changes include modified habitat score ranges in wetland buffer tables.	Recommended: It is recommended to update CARL Section 4.E, Table 4-1 Standard Wetland Buffer Widths, to be consistent with current Ecology guidance and then incorporate by reference the updated CARL in the SMP. Updating this table to reflect Ecology's 2018 guidance would result in a decrease in buffer widths for lower rated wetlands. A discussion is provided below.

6.1.1 Ecology Wetland Buffer Guidance

In July 2018, Ecology updated its guidance for wetland buffers. The change in guidance is the result of Ecology's continued evaluation of the 2014 wetland rating system as it relates to the 2004 wetland rating system. Ecology's intent was that the change from the 2004 to 2014 rating system would not significantly affect resulting buffers. According to Ecology's 2018 calibration, their guidance suggests that wetlands with a habitat score of 5 should be considered "low" functioning rather than "low/medium" functioning. This generally results in a smaller wetland buffer for those with a habitat score of 5 when compared to the SMP's current critical area regulations in Ord. 180. Notably, no changes will occur to wetlands scoring high in habitat function.

If adopted, new wetland buffers may differ slightly from the existing tables in Ord. 180 (see Tables 3-2 and 3-3 below). Three factors will continue to determine the wetland buffer widths aligning with state law: the wetland category, the intensity of the land use impacts, and the wetland functions or special characteristics that need to be protected. Note, the minor amendments to CARL adopted in 2019 (Ord. 180A, dated December 30, 2019) do not change wetland buffers currently adopted within the SMP.

Table 3-2 Existing CARL Section 4.E – Table 4-1 Standard Wetland Buffer Width¹

Wetland Category	Habitat Score	Impact of Proposed Land Use		
		Low	Moderate	High
Category I: Bogs	NA	125 ft	190 ft	250 ft
Category I: Wetlands with a high conservation value	NA	125 ft	190 ft	250 ft
Category I: Estuarine	NA	100 ft	150 ft	200 ft

Wetland Category	Habitat Score	Impact of Proposed Land Use		
		Low	Moderate	High
Category I: Coastal Lagoons	NA	100 ft	150 ft	200 ft
Category I: Interdunal	NA ²	150 ft	225 ft	300 ft
Category I (other than above)	8-9	150 ft	225 ft	300 ft
	5-7	75 ft	110 ft	150 ft
	<5	50 ft	75 ft	100 ft
Category II: Interdunal	NA ³	75 ft	110 ft	150 ft
Category II: Estuarine	NA	75 ft	110 ft	150 ft
Category II: (other than above)	8-9	150 ft	225 ft	300 ft
	5-7	50 ft	75 ft	150 ft
	<5	50 ft	75 ft	100 ft
Category III	5-7	75 ft	110 ft	150 ft
	<5	40 ft	60 ft	80 ft
Category IV (all)	NA	25 ft	40 ft	50 ft

¹Buffers for wetlands surrounding existing manmade canals are not subject to these standard wetland buffer widths, and are defined in Subsection 4.E.6.

² Interdunal wetlands greater than one (1) acre that score 8 or 9 points for habitat are rated Category I.

³ Interdunal wetlands that score 7 or lower for habitat and are greater than one (1) acre or found in a mosaic of wetlands and dunes larger than one (1) acre, are rated Category II.

Table 3-3 Wetland buffer widths (in feet) under Ecology's 2018 Guidance (changes highlighted)

CARL Section 4.E – Table 4-1 Standard Wetland Buffer Width¹ (*proposed*)

Wetland Category	Habitat Score	Impact of Proposed Land Use		
		Low	Moderate	High
Category I: Bogs	NA	125 ft	190 ft	250 ft
Category I: Wetlands with a high conservation value	NA	125 ft	190 ft	250 ft
Category I: Estuarine	NA	100 ft	150 ft	200 ft
Category I: Coastal Lagoons	NA	100 ft	150 ft	200 ft
Category I: Interdunal	NA ²	150 ft	225 ft	300 ft
Category I (other than above)	8-9	150 ft	225 ft	300 ft
	5 6-7	75 ft	110 ft	150 ft
	< 5 6	50 ft	75 ft	100 ft
Category II: Interdunal	NA ³	75 ft	110 ft	150 ft
Category II: Estuarine	NA	75 ft	110 ft	150 ft
Category II: (other than above)	8-9	150 ft	225 ft	300 ft
	5 6-7	50 ft	75 ft	150 ft
	< 5 6	50 ft	75 ft	100 ft
Category III	5 6-7	75 ft	110 ft	150 ft
	< 5 6	40 ft	60 ft	80 ft
Category IV (all)	NA	25 ft	40 ft	50 ft

¹Buffers for wetlands surrounding existing manmade canals are not subject to these standard wetland buffer widths, and are defined in Subsection 4.E.6.

² Interdunal wetlands greater than one (1) acre that score 8 or 9 points for habitat are rated Category I.

³ Interdunal wetlands that score 7 or lower for habitat, and are greater than one (1) acre or found in a mosaic of wetlands and dunes larger than one (1) acre, are rated Category II.

4. Consistency with Comprehensive Plan & Other Development Regulations

Based on a review of the 2021 Pacific County Comprehensive Plan; 2017 SMP; and Zoning Ordinance 184, dated December 21st, 2017; there are no major inconsistencies found in the Comprehensive Plan and development regulations.

5. Other Issues for Consideration

The following recommendations (Table 5-1) from The Watershed Company and County staff are primarily to improve clarity and functionality of the SMP and shoreline permit processes.

As this project moves forward, The Watershed Company, County staff, and the County Planning Commission have the opportunity to provide recommendations in improving clarity and functionality of the SMP and shoreline permit processes. Review of shoreline environment designation maps is not part of the periodic review process. However, the County may assess specific mapping questions on an as-needed basis during this review to ensure accuracy. The Planning Commission recently reviewed a request to revise the classification of single-family residential development in the Coastal Conservancy shoreline environment from Prohibited (X) to Conditional Use (C). The Planning Commission did not approve of this request.

Table 5-1. Other Issues for Consideration

#	Issue	Review / SMP Location	Department Recommendation
1	Shoreline Stabilization Interpretation Policy (2019)	The Pacific County Department of Community Development (DCD) determined through a policy interpretation dated August 6, 2019, that hard armoring elements (dynamic rock revetments, rep rap placement, etc.) for shoreline stabilization measures within the Willapa Bay Conservancy Shoreline	Amend SMP Section 5.21 B, Regulations, to specifically allow hybrid measures in the Willapa Bay Conservancy, as defined under "Shoreline Stabilization" in SMP Section 2, Definitions. Consider amending Table 5-1, Permitted Uses and Modifications by Environment Designation, to add a row for the use of hybrid structures.

#	Issue	Review / SMP Location	Department Recommendation
		Designation will be allowed in conjunction with soft armoring measures as an acceptable “hybrid” shoreline stabilization measure. Such construction may be allowed if all other shoreline stabilization requirements are met within the SMP.	
2	Absence of tree pruning standards for view preservation	SMP section 4.5 Vegetation Management does not contain guidelines for when tree limbing is allowed for view preservation, or to what degree for tree crowning.	While trimming is not necessarily considered development, the County may consider adding a distinction that tree limbing is permitted for view preservation but not view creation. Additionally, consider establishing a standard for maximum limbs to be removed within a certain time period.
3	Consider adding North Cove to the list of existing public access points for beach driving.	SMP Section 5.18, Policy A.10. Seasonal use is desired by permanent residents and there is concern that access could be cut off. Adding to policy list of access points will help preserve this use.	To be determined
4	The County’s process for amending the SMP is not clear or well understood	SMP Section 8, Administration, subsection 8.11, Amendments to the Master Program and Periodic Review	Consider providing a clear process for individual proposed amendments from members of the public.
5	Fix minor typos, grammar, scrivener’s errors in the SMP	Located throughout SMP	Definitions section includes the acronym “DOE” for the WA Department of Ecology. However, this acronym is not used in the SMP. Additionally, the SMP occasionally uses “Ecology” instead of “Department of Ecology.” Since lower case “ecology” is used to describe the shoreline, it is recommended to remove the defined term of “Ecology” from the definitions section and replace all use of “Ecology” with “Department of Ecology.”

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