

# memorandum

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to Miranda Redinger, City of Shoreline

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subject Shoreline SMP Update - Draft Shoreline Environment Designations

## Introduction

This memorandum refines the proposed environment designations that were recommended in the December 2008 Recommendations Report. Similar to the Recommendation Report, this memorandum includes the purpose of shoreline environment designations, as described in the state guidelines, and general recommendations for environment designation types appropriate for the City of Shoreline. Specific environment designations for the city's shoreline that were included in the Recommendations Report are finalized in this memorandum. Feedback from Shoreline Planning Commission members provided during the August 20, 2009 Open House and Planning Commission meeting has been incorporated. Additional recommendations have been included for appropriate shoreline use and modification activities and buffer width for each environment designation. The memorandum concludes with recommendations on how to develop regulatory language for active landslide hazard areas and nonconforming residential development. Shoreline's Development Code offers protections for nonconforming uses and structures that were legally established prior to a change in regulations. Another way of stating this is that they have been "grand-fathered."

## Shoreline Environment Designations

### Purpose of Shoreline Environment Designations

The City's Shoreline Master Program (SMP) establishes a system to classify shoreline areas into specific "environment designations." This system of classifying shorelines is established by the Shoreline Management Act (RCW 90.58) and Master Program Guidelines (WAC 173-26-211). The purpose of shoreline environment designations is to provide a uniform basis for applying policies and regulations in distinct shoreline areas having similar characteristics. Generally, shoreline designations should be based on:

1. Ecological functions provided by the shoreline (including biological resources and critical area characteristics);

2. Existing and planned development patterns; and
3. The community’s vision or objectives for its future management.

State Master Program Guidelines (WAC 173-26-150 and 176-26-160) give local jurisdictions the option to plan for shorelines in designated Urban Growth Areas (UGA) and Potential Annexation Areas (PAA). Portions of the Puget Sound shoreline are in the City’s PAA. The City can “pre-designate” shoreline environments in the PAA as part of this planning process. However, shorelines in the PAA would continue to be regulated under the provisions of the Snohomish County SMP until the City annexes those areas.

## **City and State Shoreline Environment Designations**

When the City of Shoreline incorporated in 1995, it adopted regulations outlined in Title 25 (Shoreline Management Plan) of the King County Code as the interim shoreline management code (Shoreline Municipal Code [SMC] 16.10). Three shoreline environment designations are established in the King County Shoreline Management Master Program:

1. Urban,
2. Rural, and
3. Conservancy

The 2003 state guidelines identify six basic shoreline environment designations, associated management policies, and designation criteria to assist jurisdictions with their updates. As outlined in WAC 173-26-211, these are:

1. Aquatic,
2. Natural,
3. Rural Conservancy,
4. Urban Conservancy,
5. Shoreline Residential, and
6. High-Intensity.

Table 1 describes the six shoreline environment designations recommended for consideration under Ecology’s guidelines. These designations may be tailored to fit each local jurisdictions unique shoreline characteristics.

**Table 1. Shoreline Environment Designations Described in 2003 State Shoreline Guidelines (WAC 173-26-211)**

<i>Environment Designation</i>	<i>Purpose</i>	<i>Criteria for Assigning Designations</i>
Aquatic	The purpose of the "aquatic" environment is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark.	Assign an "aquatic" environment designation to lands waterward of the ordinary high-water mark.
Natural	The purpose of the "natural" environment is to protect those shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline functions intolerant of human use. These systems require that only very low intensity uses be allowed in order to maintain the ecological functions and ecosystem-wide processes. Consistent with the policies of the designation, local government should include planning for restoration of degraded shorelines within this environment.	A "natural" environment designation should be assigned to shoreline areas if any of the following characteristics apply: (A) The shoreline is ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity; (B) The shoreline is considered to represent ecosystems and geologic types that are of particular scientific and educational interest; or (C) The shoreline is unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.
Rural Conservancy	The purpose of the "rural conservancy" environment is to protect ecological functions, conserve existing natural resources and valuable historic and cultural areas in order to provide for sustained resource use, achieve natural flood plain processes, and provide recreational opportunities. Examples of uses that are appropriate in a "rural conservancy" environment include low-impact outdoor recreation uses, timber harvesting on a sustained-yield basis, agricultural uses, aquaculture, low-intensity residential development and other natural resource-based low-intensity uses.	Assign a "rural conservancy" environment designation to shoreline areas outside incorporated municipalities and outside urban growth areas, as defined by RCW 36.70A.110, if any of the following characteristics apply: (A) The shoreline is currently supporting lesser-intensity resource-based uses, such as agriculture, forestry, or recreational uses, or is designated agricultural or forest lands pursuant to RCW 36.70A.170; (B) The shoreline is currently accommodating residential uses outside urban growth areas and incorporated cities or towns; (C) The shoreline is supporting human uses but subject to environmental limitations, such as properties that include or are adjacent to steep banks, feeder bluffs, or flood plains or other flood-prone areas; (D) The shoreline is of high recreational value or with unique historic or cultural resources; or (E) The shoreline has low-intensity water-dependent uses.

<b><i>Environment Designation</i></b>	<b><i>Purpose</i></b>	<b><i>Criteria for Assigning Designations</i></b>
Urban Conservancy	The purpose of the "urban conservancy" environment is to protect and restore ecological functions of open space, flood plain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses.	Assign an "urban conservancy" environment designation to shoreline areas appropriate and planned for development that is compatible with maintaining or restoring of the ecological functions of the area, that are not generally suitable for water-dependent uses and that lie in incorporated municipalities, urban growth areas, or commercial or industrial "rural areas of more intense development" if any of the following characteristics apply: (A) They are suitable for water-related or water-enjoyment uses; (B) They are open space, flood plain or other sensitive areas that should not be more intensively developed; (C) They have potential for ecological restoration; (D) They retain important ecological functions, even though partially developed; or (E) They have the potential for development that is compatible with ecological restoration.
Shoreline Residential	The purpose of the "shoreline residential" environment is to accommodate residential development and appurtenant structures that are consistent with this chapter. An additional purpose is to provide appropriate public access and recreational uses.	Assign a "shoreline residential" environment designation to shoreline areas inside urban growth areas, as defined in RCW 36.70A.110, incorporated municipalities, "rural areas of more intense development," or "master planned resorts," as described in RCW 36.70A.360, if they are predominantly single-family or multifamily residential development or are planned and platted for residential development.
High-Intensity	The purpose of the "high-intensity" environment is to provide for high-intensity water-oriented commercial, transportation, and industrial uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded.	Assign a "high-intensity" environment designation to shoreline areas within incorporated municipalities, urban growth areas, and industrial or commercial "rural areas of more intense development," as described by RCW 36.70A.070, if they currently support high-intensity uses related to commerce, transportation or navigation; or are suitable and planned for high-intensity water-oriented uses.

## Broad Recommendations – Environment Designation Types

The Ecology 2003 guidelines provide that local jurisdictions may retain their current environment designations, or create their own designations, as long as the environment designation system is consistent with the purposes and policies in the state guidelines (WAC 173-26-211). However, if a local jurisdiction determines a need to depart from Ecology’s recommended menu of designations (provided in Table 1) to address special or unique circumstances, then coordination with Ecology staff may be necessary to demonstrate how the designation system meets the overall purposes and policies in the guidelines.

In the context of findings in the *Shoreline Inventory and Characterization* report, we reviewed the City’s existing shoreline environments, the suggested designation system in the Ecology guidelines (173-26-211(5)), and existing uses and functions along the Puget Sound. Since Snohomish County is also undergoing a SMP update, we also reviewed the County’s draft shoreline environment designations. The Point Wells site has been assigned an “Aquatic” and “Urban” environment designation according to the Snohomish County Draft SMP (Snohomish PDS, 2008a). The “Aquatic” designation would apply waterward of the ordinary high water mark, while the “Urban” designation would apply landward of the ordinary high water mark (Snohomish PDS, 2008a). Discussions between Snohomish County and the City of Shoreline would ensure that the designations are coordinated to ease future transition.

We suggest the City consider the following general recommendations for replacing and updating the environment designation system in the City’s SMP.

### Utilize three of Ecology’s recommended designations.

- **“Aquatic”** – There are no uses or activities that are wholly contained below the OHWM in the Puget Sound. The only current use that extends beyond the OHWM is located at Point Wells, with potential for new overwater structures at Richmond Beach and Richmond Beach Saltwater Park. Structures that extend waterward of the OHWM simultaneously affect areas both below and above OHWM (e.g. docks, piers, habitat restoration). In order to be consistent with Snohomish County’s draft shoreline environment designations, the aquatic designation should be applied to the area waterward of the OHWM along the entire length of the city’s shoreline.
- **“Urban Conservancy”** – Ecology’s “Urban Conservancy” allows for a variety of uses while recognizing the need to manage natural resources and critical areas and to promote restoration of ecological functions in urban areas. This designation would be applied to developed shoreline areas, regardless of use, that also have designated critical areas, intact shoreline ecological functions, or areas with potential for restoration, such as the southern portion of Point Wells, Barnacle Creek, Richmond Beach Saltwater Park, Innis Arden Reserve and Boeing Creek Reserve.
- **“Shoreline Residential”** – This designation would be applied to areas that are predominately single-family residential. This designation could be applied to residentially developed areas, such as Richmond Beach and Innis Arden.

### **Do not utilize three of Ecology’s recommended designations.**

Based on the 2003 guidelines and the results of the 2008 *Shoreline Inventory and Characterization Report*, we do not believe the following Ecology designations would be appropriate for use in the city of Shoreline:

- **“High Intensity”** – The only property in the City’s shoreline that has not been developed as an institutional or residential use is Point Wells, located in the City’s PAA. Point Wells is currently being used as an industrial property utilizing ships to distribute petroleum products. However, the majority of the on-site structures and infrastructure were developed over 60 years ago (City of Shoreline, 1998). Critical saltwater habitats are documented along this shoreline. Eelgrass is documented along the entire length of Point Wells. Kelp, barnacles, and dune grass are also documented along its shoreline. Thirty-one species of shellfish have been identified along this shoreline. There are several indications that the property would be redeveloped as a mix of residential, office and/or commercial uses. One indication is that City’s Comprehensive Plan designates the property as Mixed Use. The second indication is that Snohomish County has recently changed the property’s Comprehensive Plan designation from Urban Industrial to Urban Center and the zoning designation from Heavy Industrial to Planned Community Business (Snohomish County Council, 2009). For these reasons, we feel that High Intensity is not an appropriate designation. Instead, a newly created environment designation that applies to the northern portion of Point Wells could be considered (see “Point Wells Urban” below). This would be largely consistent with Snohomish County’s draft shoreline environmental designation of “Urban”.
- **“Natural”** – This designation would be applied to those areas that are ecologically intact, are unable to support new development or uses without impacts to ecological functions or risk to human safety, and have important natural resources and critical areas associated with them. Since almost the entire length of the city’s shoreline is armored, the natural designation would not apply.
- **“Rural Conservancy”** – These areas are intended for shorelines outside of incorporated cities and designated Potential Annexation Areas.

### **Create two new environment designations.**

- **“Point Wells Urban”** – This designation could be applied to the north portion of Segment A in the City’s PAA. A “Point Wells Urban” designation would accommodate higher density uses while protecting existing ecological functions and restoring ecological functions that have been degraded. The “Urban” designation is currently being proposed by Snohomish County as part of its SMP update. Consistency with the County SMP would be beneficial for City, County, and Ecology staff in administering the shoreline programs.
- **“Waterfront Residential”**- This designation is meant to distinguish between the residential portions of the coastline where natural and manmade features preclude building within the shoreline jurisdiction and the section along 27<sup>th</sup> Ave. NW where residences directly abut the Puget Sound. Unique circumstances and considerations will warrant different regulations for each area.

## Specific Recommendations

This section describes recommendations for specific shoreline segments in the city and its PAA.

Table 2 shows the existing shoreline environment designations from the City and Snohomish County's SMP and the proposed environment designations. The attached maps show the existing designations and recommended environment designations for the SMP update.

**Table 2. Existing and Proposed Shoreline Environment Designations by Planning Segment**

<i>Planning Area</i>	<i>Planning Segment</i>	<i>Existing Shoreline Environment Designations<sup>1</sup></i>	<i>Preliminary Recommended Environment Designations<sup>2</sup></i>
Entire Length of Shoreline Waterward of the OHWM	Segments A through E	Marine, only in the PAA (Snohomish County)	Aquatic
Northern Portion of Potential Annexation Area	Segment A	Urban (Snohomish County)	Point Wells Urban
Southern Portion of Potential Annexation Area	Segment A	Urban (Snohomish County)	Point Wells Urban Conservancy
Northern city limits near Barnacle Creek	Segment B	Urban (City of Shoreline)	Urban Conservancy
Richmond Beach Residential Area	Segment B	Urban (City of Shoreline)	Shoreline Residential
Richmond Beach Residential Area- 27 <sup>th</sup> Ave. NW	Segment B	Urban (City of Shoreline)	Waterfront Residential
Richmond Beach Saltwater Park	Segment C	Urban (City of Shoreline)	Urban Conservancy
Innis Arden Residential Area	Segment C and Segment D	Rural (City of Shoreline)	Shoreline Residential
Innis Arden Reserve / Highlands	Segment E	Rural/Conservancy (City of Shoreline)	Urban Conservancy

1. Shoreline SMP (King County, 1978; SMC 16.10); Snohomish County website (Snohomish County PDS, 2008b)
2. Potential designations for discussion and consideration.

## Rationale

This section describes how the Shoreline Inventory and Characterization Report prepared in December 2008 informed our choice for environment designations for the city's shoreline.

## **Point Wells Urban**

According to the Shoreline Inventory and Characterization Report, the northern half of the PAA is characterized by upland development and shoreline modifications. Creating a unique designation that only applies to the northern half of Point Wells is appropriate so that policies and regulations unique to an industrial use or a future mix of uses can be developed.

## **Point Wells Urban Conservancy**

The southern half of the PAA retains important ecological functions including natural beach habitat. According to the Shoreline Inventory and Characterization Report, the shoreline contains eelgrass meadows and kelp forests, forage fish spawning area, 31 species of shellfish, a sand and gravel flat, and receives sediment input from an unarmored shoreline. A small stream enters this reach creating pocket estuary habitat. An Urban Conservancy designation specifically tied to Point Wells may be appropriate so that policies and regulations unique to an industrial use or a future mix of uses can be developed. Existing and planned uses in other Urban Conservancy environment designations are residential and recreational which would require a different set of policies and regulations.

## **Urban Conservancy**

Urban Conservancy designation is applied to portions of the city's shoreline that retain important ecological functions. According to the Shoreline Inventory and Characterization Report, the northern half of Segment B contains eelgrass meadows and kelp forests, a sand flat, forage fish spawning area, and a forested wetland. Also, Barnacle Creek discharges into the Puget Sound in two places; both serving as restoration opportunities. Segment C contains eelgrass meadows and kelp forests, forage fish spawning area, 37 species of shellfish, and receives sediment input from an unarmored shoreline. Segment E contains eelgrass meadows and kelp forests, a sand flat, and the Boeing Creek outlet which serves as an important area for feeding, migration, spawning, and rearing of forage fish. Although the shoreline is modified by the BNSF railroad tracks, riparian vegetation is prevalent upslope of the tracks throughout the entire length of Segment E. This segment is also characterized by landslide hazard areas and has recently seen numerous slide activities.

Urban Conservancy is an appropriate designation for these segments since it serves to protect ecological functions described in the Shoreline Inventory and Characterization Report while also allowing limited development when appropriate.

## **Shoreline Residential**

Existing land uses in the southern portion of Segment B and Segment D are mainly residential. City Comprehensive Plan and zoning designations for these segments are residential except that the BNSF ROW is designated as Public Facilities. Therefore, Shoreline Residential is an appropriate environment designation to accommodate residential development and appurtenant structures.

## **Aquatic**

Uses or activities that extend waterward of the OHWM would be governed by the aquatic shoreline environment designation. This is deemed appropriate in order to maintain consistency with the Snohomish County's draft shoreline environment designations. Designating the area Aquatic on the shoreline environment designation map could also serve to communicate to property owners along the coastline that development extending waterward of the OHWM would also be governed by the SMP.

## **Purpose Statements**

[PLACEHOLDER]

## **Management Policies**

[PLACEHOLDER]

## **Regulations**

[PLACEHOLDER]

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# Uses and Modification Activities in Proposed Shoreline Environment Designations

The following draft recommendations are intended to assist the City in updating the shoreline master program by developing a list of uses and modification activities appropriate for each environment designation. The table below is organized around regulated activities according to state guidelines. It includes “uses” (such as commercial and residential development) and “modifications” (alterations of the shoreline or structures typically needed to support an allowed “use” [such as bulkheads, docks, piers, etc.]

Uses or activities are noted for each proposed shoreline environment designation as “Permitted,” “Conditional,” or “Prohibited.”

- P** = Permitted - Permitted uses may require Shoreline Substantial Development Permits and any other permits required by the Shoreline Municipal Code and/or other regulatory agencies.
- C** = Conditional Use - Conditional uses require Shoreline Conditional Use Permit and may require other permits required by the Shoreline Municipal Code and/or other regulatory agencies.
- X** = Prohibited

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**Table 3. Permitted and Prohibited Shoreline Activity**

<i>Shoreline Modification or Use</i>	<i>Shoreline Environment Designations</i>				
	<i>Aquatic</i>	<i>Point Wells Urban</i>	<i>Point Wells Urban Conservancy</i>	<i>Urban Conservancy</i>	<i>Shoreline Residential</i>
<b>Shoreline Modification</b>					
Breakwaters, jetties, groins, and weirs	C <sup>1</sup>	C	X	X	X
Dredging and Dredge Material Disposal	P <sup>1</sup> : Dredge disposal Dredging related to remediation  C: Dredging related to navigation abutting Point Wells Urban only	P: Dredge disposal for shoreline habitat and natural systems enhancement, fish habitat enhancement, or watershed restoration project  Dredging related to remediation	P: Dredge disposal for shoreline habitat and natural systems enhancement, fish habitat enhancement, or watershed restoration project  Dredging related to remediation	P: Dredge disposal for shoreline habitat and natural systems enhancement, fish habitat enhancement, or watershed restoration project	P: Dredge disposal for shoreline habitat and natural systems enhancement, fish habitat enhancement, or watershed restoration project
Dune Modification	X	X	X	X	X
Piers and Docks	P <sup>1</sup>	P: Existing piers or docks associated with industrial use  Public piers or docks  C: Expansion of existing piers or docks when associated with water-oriented industrial use	X	P: Only public piers or docks	P: Only community piers or docks
Structural flood hazard reduction (dikes and levees)	X	X	X	X	X

<i>Shoreline Modification or Use</i>	<i>Shoreline Environment Designations</i>				
	<i>Aquatic</i>	<i>Point Wells Urban</i>	<i>Point Wells Urban Conservancy</i>	<i>Urban Conservancy</i>	<i>Shoreline Residential</i>
Shoreline Stabilization (Bulkheads and Revetments)	P <sup>2</sup> : Soft-shore stabilization  Maintenance of existing  X: Hard shoreline armoring	P: Soft-shore stabilization  Maintenance of existing  C: Hard shoreline armoring	P: Soft-shore stabilization  When associated with allowed utilities	P: Soft-shore stabilization;  Maintenance of existing  C: Hard shoreline armoring	P: Soft-shore stabilization;  Maintenance of existing  C: Hard shoreline armoring
Clearing and Grading	X	P: If associated with allowed shoreline development, shoreline restoration or remediation.	P: For activities associated with shoreline restoration or remediation; or limited if associated with public access improvement and allowed shoreline development.	P: For activities associated with shoreline restoration; or limited if associated with public access improvement and allowed shoreline development	P: If associated with allowed shoreline development or shoreline restoration.
Fill	P: For activities associated with shoreline restoration or remediation	P: If associated with allowed shoreline development, shoreline restoration or remediation.	P: For activities associated with shoreline restoration or remediation; or limited if associated with public access improvement and allowed shoreline development.	P: For activities associated with shoreline restoration; or limited if associated with public access improvement and allowed shoreline development.	P: If associated with allowed shoreline development or shoreline restoration.
Shoreline Habitat and Natural Systems Enhancement Projects	P	P	P	P	P
<b>Shoreline Use</b>					
Agriculture	X	X	X	X	X
Aquaculture	X	X	X	X	X
Boating Facilities (marinas and boat launching ramps)	P <sup>1</sup>	P	X	P: Boat launching ramps open to the public, otherwise prohibited	P: Boat launching ramps
Commercial Development	X	P	P	X	X

Shoreline Modification or Use	Shoreline Environment Designations				
	Aquatic	Point Wells Urban	Point Wells Urban Conservancy	Urban Conservancy	Shoreline Residential
Forest Practices	X	X	X	X	X
Industrial Development	X	P: Only existing industrial development C: Expansion of existing industrial development	P: Only existing industrial development	X	X
In-stream Structures	P <sup>1</sup>	X	X	P: Only as part of a fish habitat enhancement or a watershed restoration project	P: Only as part of a fish habitat enhancement or a watershed restoration project
Mining	X	X	X	X	X
Recreation (water related)	C: Water-dependent only	P	P: Limit to low intensity uses, passive uses	P	P
Residential Developments	X	P	P	P	P
Signs	X	P	P	P	P
Permanent Solid Waste Storage or Transfer Facilities	X	X	X	X	X
Transportation Facilities (Roads and Bridges)	X	P	C	C	P
Transportation Facilities <sup>3</sup> (Railroads)	P	P	P	P	P
Utilities	C	P: Underground facilities C: Aboveground facilities	P: Underground facilities C: Aboveground facilities	P: Underground facilities C: Aboveground facilities	P: Underground facilities C: Aboveground facilities
Unclassified Uses	C	C	C	C	C

<sup>1</sup>Subject to the use limitations and permit requirements of the abutting upland shoreline environment designation.

<sup>2</sup> Allowed only if permitted in the abutting upland shoreline environment designation.

<sup>3</sup> The City recognizes the Federal preemption for local permitting per the ICC Termination Act of 1995, 49 U.S.C. § 10501(b); however, for the purposes of Coastal Zone Management consistency the railroad company would be required to comply with the policies of the City of Shoreline’s SMP.

## Native Vegetation Conservation Area

**Table 4. Recommended Minimum Native Vegetation Conservation Area**

<i>Shoreline Environment Designations</i>	<i>Minimum Native Vegetation Conservation Area (in feet)</i>	<i>Additional Bulk Dimensional Standards [PLACEHOLDER]</i>
<b>Point Wells Urban</b>	50 (restoration required as part of redevelopment)	
<b>Point Wells Urban Conservancy</b>	115	
<b>Urban Conservancy</b>	150 feet or 50 feet from the top of the landslide hazard area, whichever is greater	
<b>Shoreline Residential</b>	115	
<b>Shoreline Waterfront</b>	20	

## Additional Policy and Regulation Recommendations

When integrating the critical areas ordinance with the Shoreline Master Program, regulations should be developed that not only protect people and property from risk of landslide hazards as shown in SMC 20.80.230 but also to protect the natural function that active landslide areas provide for the nearshore environment. The Shoreline Inventory and Characterization Report establishes the value that active landslide hazard areas provide to the nearshore environment. At Point Wells, hard armoring should be avoided or removed whenever possible, vegetation should be retained and buildings should be setback so that this natural process can continue to function or is restored. Hard armoring in the Richmond Beach area along 27<sup>th</sup> Ave. NW is necessary for residential property protection and may be maintained.

Appropriate nonconforming regulations should be developed to address single family developments located in the required Shoreline Residential buffer. Nonconforming language that may be useful for the City of Shoreline to incorporate can be found in draft SMPs for Sammamish and Issaquah.

Specific policy language should be developed for railroad activities that encourage avoidance and minimization of impacts to critical areas and the nearshore shoreline environment. Ecology will review such policy language as part of its Coastal Zone Management consistency review. Railroad companies are required to comply with the SMP to the extent feasible.

## References

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