



memorandum

date September 19, 2011

to LaJane Schopfer, Mason County
Joint Technical Advisory Committee
Mason County Citizen Advisory Committee

cc Tim Gates, Washington State Department of Ecology

from Reema Shakra and Teresa Vanderburg, ESA

subject Mason County SMP Update: Updating Shoreline Environment Designations

Shoreline Environment Designations (SEDs)

Recommendations for new Shoreline Environment Designations are a required part of the Shoreline Master Program (SMP) update process for all local jurisdictions. Task 3.3 of the Ecology Grant No. G1100004 outlines the requirement for review and update of the County's shoreline environmental designation system. The existing SEDs are found in the Mason County SMP adopted in 1975, revised in 1988.

Do the current SEDs have to be changed?

Existing SEDs in Mason County must be re-evaluated as part of the SMP update. Although it is not required to use the specific designations recommended in WAC 173-26-211, each jurisdiction is required to review their designations to determine whether they are appropriate for meeting the requirements of the Shoreline Management Act (SMA). In addition to the adoption of the new guidelines in Chapter 173-26 WAC, changes that have occurred since the last update of the Mason County SMP make it appropriate to revise the designations to a limited degree. Those changes include simplification of the in-water designation system and limiting urban designations to urban growth areas, hamlets, or rural activity centers. In addition, development of a more

What are SEDs?

Shoreline environment designations are a type of regulatory overlay that apply to shoreline properties in addition to underlying zoning districts. Various types of development are allowed or prohibited based on the property's SED and are regulated by a specific set of rules. SEDs are applied to shorelines so that areas with similar characteristics are managed and regulated according to similar objectives and standards. In 2003 the Department of Ecology developed guidelines [Washington Administrative Code (WAC) 173-26-211] for establishing SEDs in order to plan and effectively manage shoreline resources. The guidelines are intended to be used by local governments in the preparation of shoreline master programs. The current SEDs in Mason County generally follow the model recommended by Ecology at the time of adoption.

complete shoreline inventory as part of the current update will allow more consistent application of designation criteria.

The purpose of this document is to outline a method for updating the designations and designation criteria for the Mason County SMP. We recommend changes that will improve management of Mason County shorelines and better align Mason County's Shoreline Master Program (SMP) policies and regulations with the County's Comprehensive Plan, County's zoning and requirements of Ecology's WAC. This document is for discussion purposes and for use by County staff, the Joint Technical Advisory Committee (JTAC) and the Citizens Advisory Committee (CAC) advising County staff on the update. The recommendations presented here may change or be further refined after discussion with the committees.

What are the current SEDs in Mason County?

In Mason County, there are currently six existing shoreline environment designations adopted in the County SMP dated 1988. These SEDs are:

1. Natural,
2. Conservancy,
3. Rural,
4. Urban Residential,
5. Urban Industrial, and
6. Urban Commercial.

Table 1 describes the purpose of each of the designations as outlined in the 1988 SMP and the criteria by which the designations should be applied. The language included under the designation criteria column sometimes includes policy statements on developing appropriate regulations.

TABLE 1. EXISTING SHORELINE ENVIRONMENT DESIGNATIONS FROM MASON COUNTY SMP 1988

Designation	Definition / Purpose	Designation Criteria – General	Designation Criteria – Marine Shorelines	Example Shorelines
Natural	The natural environment is intended to preserve and restore those natural resource systems existing relatively free of human influence. Local policies to achieve this objective should aim to regulate all potential developments degrading or changing the natural characteristics that make these areas unique and valuable.	<p>The primary determinant for designating an area as a natural environment is the actual presence of some unique natural or cultural features considered valuable in their natural or original condition which are relatively intolerant of intensive human use.</p> <p>The main emphasis of regulation in these areas should be on natural systems and resources, which require severe restrictions of intensities and types of uses to maintain them in a natural state. Therefore, activities, which may degrade the actual or potential value of this environment, should be strictly regulated. Any activity that would bring about a change in the existing situation would be desirable only if such a change would contribute to the preservation of the existing character.</p>	<p>The following must be designated as Natural:</p> <ul style="list-style-type: none">• Marine waters lying adjacent to shorelands designated as Natural Environment from the line of mean higher high tide to a depth of one fathom.• Waters adjacent to shorelands of any environment designation which are ten fathoms or more in depth.	<p>Lilliwaup Swamp</p> <p>Lake Cushman (north portion)</p> <p>South Fork Skokomish River (middle portion)</p>

Designation	Definition / Purpose	Designation Criteria – General	Designation Criteria – Marine Shorelines	Example Shorelines
Conservancy	<p>Conservancy environment means that environment in which the objective is to protect, conserve and manage existing natural resources and valuable historic and cultural areas in order to ensure a continuous flow of recreational benefits to the public and to achieve sustained resource utilization.</p> <p>The designation of Conservancy Environments should seek to satisfy the needs of the community as to the present and future location of recreational areas proximate to concentrations of population, either existing or projected.</p>	<p>Areas which are intended to maintain their existing character. The preferred uses are those which are by nature <i>non-consumptive</i> of the physical and biological resources of the area.</p> <p><i>Non-consumptive</i> means uses which can utilize resources on a sustained yield basis while minimally reducing opportunities for other future uses of the resources in the area. Activities and uses of a nonpermanent nature which do not substantially degrade the existing character of an area are appropriate uses for a Conservancy Environment. Examples include:</p> <ul style="list-style-type: none"> • diffuse outdoor recreation activities, • timber harvesting on a sustained yield basis, • passive agricultural uses such as pasture and range lands and other related uses and activities, • small camping or picnic facilities (less than ten spaces), • aquacultural retail booths (less than 600 square feet), and • cottage industries when the operation is entirely contained within the primary residence excluding outbuildings. <p>Areas which present too severe biophysical limitations to be designated as Rural or Urban Environments. Such limitations would include:</p> <ul style="list-style-type: none"> • areas of steep slopes presenting erosion and slide hazards, • areas prone to flooding, and • areas which cannot provide adequate water supply or sewage disposal. <p>A perennial stream's entrance into marine waters provided Shoreline Administrator determines estuarine shoreline is undeveloped or substantially undeveloped. Associated wetlands and marshes of the perennial stream estuary shall also be considered a Conservancy Environment.</p> <p>Marine shorelines where the average width of the land area between the line of mean higher high tide and the right-of-way line of an adjacent public highway is 30 feet. The Shoreline Administrator or the Advisory Board must also determine that the shoreline area is undeveloped or substantially undeveloped to be designated Conservancy.</p>	<p>Marine waters adjacent to Urban Residential Environments, Rural Environments, Conservancy Environments, and Natural Environments, between one fathom and ten fathoms in depth.</p>	<p>Hamma Hamma River South Fork Skokomish River Dewatto River Isabella Lake Lynch Cove</p>

Designation	Definition / Purpose	Designation Criteria – General	Designation Criteria – Marine Shorelines	Example Shorelines
		<p>Additional Designation Criteria for Fresh Waters</p> <p>All freshwater areas fronting on shorelands of any specific environment designation, with the following exception: freshwater areas fronting on shorelands designated as Urban Commercial Environment for a distance of 150 feet out from the line of ordinary high water, measured horizontally, and perpendicular to the line of ordinary high water.</p>		
Rural	<p>The Rural Environment is intended to protect agricultural land from urban expansion, restrict intensive development along undeveloped shorelines, function as a buffer between urban areas, and maintain open spaces and opportunities for recreational uses compatible with agricultural activities.</p>	<p>Areas characterized by intensive agricultural and recreational development. Hence, those areas that are already used for agricultural purposes, or which have agricultural potential should be maintained for present and future agricultural needs. Designation of rural environments should also seek to alleviate pressures or urban expansion on prime farming areas.</p> <p>New developments in a rural environment are to reflect the character of the surrounding area by:</p> <ul style="list-style-type: none"> • limiting residential density, • providing permanent open space and • maintaining adequate building setbacks from the water to prevent shoreline resources from being destroyed for other rural types of uses. <p><i>Public recreation facilities</i> for public use, which can be located and designed to minimize conflicts with agricultural activities, are recommended for the rural environment. Linear water access which will prevent overcrowding in any one area, trail systems for safe nonmotorized traffic along scenic corridors and provisions for recreational viewing of water areas illustrate some of the ways to ensure maximum enjoyment of recreational opportunities along shorelines without conflicting with agricultural uses.</p> <p>In a similar fashion, <i>agricultural activities</i> should be conducted in a manner that will enhance the opportunities for shoreline recreation. Farm management practices that prevent erosion and subsequent siltation of water bodies and minimize the flow of waste material into water courses are to be encouraged by the master program for rural environments.</p>	<p>Marine waters lying adjacent to shorelands designated as Rural Environment from the line of mean higher high tide to a depth of one fathom.</p>	<p>Skokomish River Johns Creek Harstine Island Skookum Inlet</p>

Designation	Definition / Purpose	Designation Criteria – General	Designation Criteria – Marine Shorelines	Example Shorelines
Urban Residential	The objective of the Urban Residential Environment is to ensure optimum utilization of shorelines for residential development.	Area of high intensity residential land use. Shorelines planned for future residential expansion should have few geographic limitations and not have a high priority for designation as an alternative environment.	Marine waters lying adjacent to shorelands designated as Urban Residential from the line of mean higher high tide to a depth of one fathom.	Hood Canal (east side and The Narrows) Case Inlet (large portion) Mason Lake
Urban Industrial	The objective of the Urban Industrial Environment is to ensure optimum utilization of shorelines within urbanized areas by managing industrial development.	Area of high intensity industrial land use. The environment does not necessarily include all shorelines within an unincorporated city, but is particularly suitable to those areas presently subjected to extremely intensive use pressure, as well as areas planned to accommodate industrial expansion. Shorelines planned for future industrial expansion should not have a high priority for designation as an alternative environment. Because shorelines suitable for urban industrial uses are a limited resource, emphasis should be given to development within already developed areas and particularly to <i>water-dependent industrial uses</i> requiring frontage on navigable waters. Industrial development is prohibited in all categories but Urban Industrial Environment.	Marine waters of Mason County which lie immediately adjacent to shorelands designated as Urban Industrial Environment from the line of mean higher tide to a depth of ten fathoms, except that the Shelton Urban Industrial Environment will extend only to the Outer Harbor Line. Existing, active, commercial log storage and booming grounds on marine and fresh waters must be considered Urban Industrial, and will supersede any other designation.	Shelton Harbor only
Urban Commercial	The objective of the Urban Commercial Environment is to ensure optimum utilization of shoreline within urbanized areas by managing commercial development.	Same as Urban Industrial, except as it applies to commercial, and the following fresh water areas: <ul style="list-style-type: none"> Freshwater areas fronting on shorelands designated as Urban Commercial Environment for a distance of 150 feet out from the line of ordinary high water, measured horizontally, and perpendicular to the line of ordinary high water. 	Same as Urban Industrial, except as it applies to commercial.	Hoodport Rural Activity Center (RAC) Portion near Union RAC Allyn UGA

Source: Mason County Code 17.50.040 Definitions and 17.50.075 Marine Waters

The Conservancy designation is the most common shoreline environment designation in Mason County, applied to approximately 43 percent of the shorelines. Many shorelines are also designated Rural and Urban Residential. Only five percent of the shorelines are currently designated Natural and one percent are designated Urban Commercial or Urban Industrial. Table 2 below provides the acres and percentages of each shoreline environment designation. Also see Map 1 on the following page for locations of existing environment designations in Mason County based upon the shoreline jurisdiction as currently regulated.

TABLE 2. ACRES AND PERCENTAGES OF EXISTING SHORELINE ENVIRONMENT DESIGNATIONS

Designation	Acres	Percentage of Total
Natural	772	5%
Conservancy	7,206	43%
Rural	3,616	22%
Urban Residential	4,882	29%
Urban Industrial	116	1%
Urban Commercial	72	0.4%
Total	16,664	100%

Source: Mason County, 2010

What do the Ecology Guidelines say about establishing SEDs?

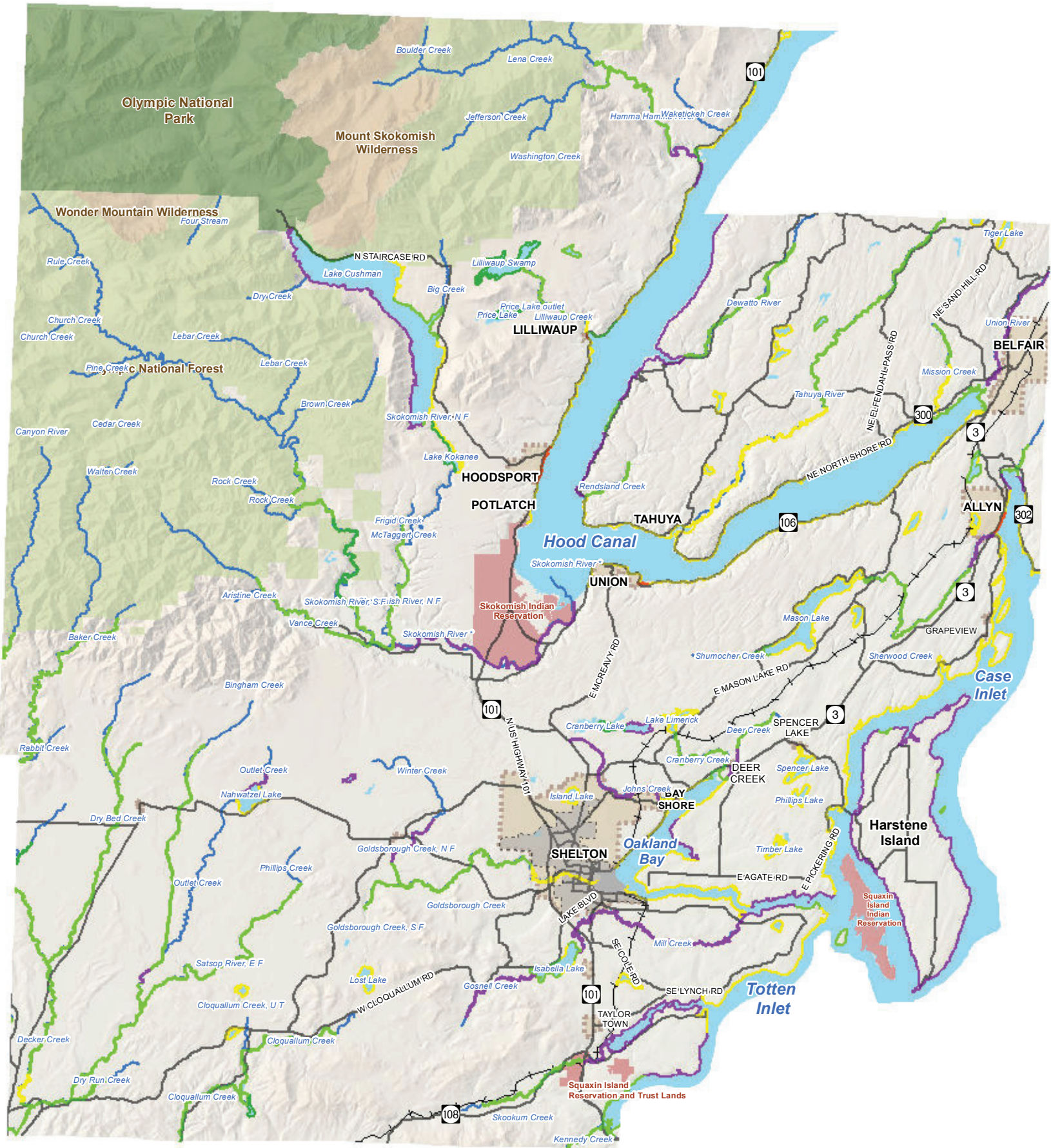
When establishing shoreline environment designations, the new shoreline guidelines (WAC 173-26-211) require that the new shoreline environment designations be based on:

1. the existing land use pattern;
2. the biological and physical character of the shoreline being considered for development; and
3. the goals and aspirations of the community as expressed through comprehensive plans.

WAC 173-26-211 recommends six different shoreline environment designations. For each designation, a purpose statement and general criteria for designation are recommended. Table 2 describes the purpose of each of the designations and the criteria by which the designations should be applied.

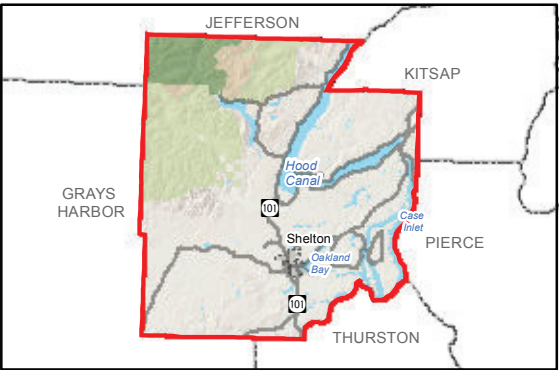
Mason County Shoreline Master Program

Map 1: Current Shoreline Environment Designations



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- Legend**
- Shoreline Environment Designation**
- NATURAL
 - CONSERVANCY
 - RURAL
 - URBAN RESIDENTIAL
 - URBAN COMMERCIAL
 - URBAN INDUSTRIAL
- Major Roads
- Railroads
- Shelton City Limits
- UGA | Rural Activity Center Boundaries | Hamlets
- Indian Reservations
- Wilderness Areas
- Olympic National Forest
- Olympic National Park

SMA Grant Agreement No. G1100004
Task 2.1

Coordinate System: State Plane NAD1983 (Ft)
Washington South FIPS 4602

NOTE: Map data shown here are the property of the sources listed below. Inaccuracies may exist, and ESA implies no warranties or guarantees regarding any aspect of data depiction.

Data Sources: Mason County, 2011 (2010); Ecology, 2009; WDNR, 2007.



Map 1: Current Shoreline Environment Designations
County Scale

Mason County
Shoreline Master Program
June 2011

TABLE 2. RECOMMENDED ENVIRONMENT DESIGNATIONS FROM ECOLOGY GUIDELINES

Designation	Purpose	Designation Criteria
Aquatic	Protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark.	Assign to lands waterward of the ordinary high-water mark.
Natural	Protect those shoreline areas that are relatively free of human influence or that include intact or minimally degraded shoreline functions intolerant of human use.	Assign to shoreline areas when any of the following characteristics apply: <ul style="list-style-type: none"> • The shoreline is ecologically intact and therefore currently performing an important, irreplaceable function or ecosystem-wide process that would be damaged by human activity; • The shoreline is considered to represent ecosystems and geologic types that are of particular scientific and educational interest; or • The shoreline is unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.
Rural Conservancy	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.	Assign to shoreline areas outside incorporated municipalities and outside urban growth areas if any of the following characteristics apply: <ul style="list-style-type: none"> • 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; • The shoreline is currently accommodating residential uses outside urban growth areas and incorporated cities or towns; • 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; • The shoreline is of high recreational value or with unique historic or cultural resources; or • The shoreline has low-intensity water-dependent uses.
Urban Conservancy	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 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: <ul style="list-style-type: none"> • They are suitable for water-related or water-enjoyment uses; • They are open space, flood plain or other sensitive areas that should not be more intensively developed; • They have potential for ecological restoration; • They retain important ecological functions, even though partially developed; or • They have the potential for development that is compatible with ecological restoration.

Designation	Purpose	Designation Criteria
Shoreline Residential	Accommodate residential development and appurtenant structures that are consistent with the SMA, and provide for appropriate public access and recreational uses.	Assign to shoreline areas inside urban growth areas, incorporated municipalities, "rural areas of more intense development," or "master planned resorts," if they are predominantly single-family or multifamily residential development or are planned and platted for residential development.
High Intensity	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 to shoreline areas within incorporated municipalities, urban growth areas, and industrial or commercial "rural areas of more intense development" if they currently support high-intensity uses related to commerce, transportation or navigation; or are suitable and planned for high-intensity water-oriented uses.

Source: WAC 173-26-211

How will the Inventory and Characterization Report inform revisions to SEDs?

A Draft Shoreline Inventory and Characterization Report (ICR) for Mason County, Washington was prepared in June 2011. The Draft ICR is a technical document and map folio that describes the existing conditions of shorelines of the state in Mason County. The Draft ICR is currently being revised in response to public and government agency review comments and will be finalized in the fall of 2011.

The Draft ICR describes existing land uses, such as residential uses, parks, and water-dependent industries. It also evaluates existing natural shoreline processes and functions, such as forested riparian areas, wetlands, wildlife habitat and fish present. The inventory report also identifies areas suitable for restoration and additional public access.

The general findings of the report include:

- County rivers and streams support numerous species of native salmon and trout, several of which are listed under the Endangered Species Act. Native shellfish beds and forage fish (i.e. sand lance, smelt and herring) are found in the nearshore areas of Hood Canal and South Puget Sound. Many other priority wildlife species, including marine mammals, shorebirds, and waterfowl, use Mason County shorelines as habitat. Eelgrass and kelp beds, mudflats, estuaries and bays are important habitats in the County. Wetlands provide valuable habitat and water quality benefits to most County shorelines.
- Numerous artificial shoreforms, such as bulkheads, exist along the shores of Mason County. These shorelines no longer resemble or function like their historic types and have resulted in the degradation of coastal processes, particularly along the shores of Hood Canal. Modifications to the natural shoreline include bulkheads, riprap, bank armoring and fill for bridges or structures. Fewer modifications and changes to nearshore processes have occurred along the shores of South Puget Sound.
- Water quality within Mason County is impaired or degraded. In South Puget Sound, water quality issues include toxic pollutants, elevated water temperatures, fecal coliform bacteria, nutrient loads, and low dissolved oxygen concentrations. In Hood Canal, the main water quality issues are low dissolved oxygen and high summer temperatures. Water quality issues for rivers and streams are sedimentation and high

temperature. These issues are caused by stormwater runoff, timber harvest, culverts, and highways and railroads that cross shorelines. The increase in impervious surfaces, installation of septic systems, and human activities along the marine shoreline are all potential sources of water quality degradation. Shellfish closures result from increased nutrients, fecal coliform and corresponding algae blooms. Water quality impairments for Mason County shoreline lakes are related to nuisance aquatic plants and nutrient loading causing algal blooms.

- Existing land uses in freshwater shoreline areas are mostly in residential uses and forestry. Vacant lands and agriculture land uses make up most of the remaining area. Residential land uses are concentrated around lakes and each house typically has individual dock or pier. Existing land uses in the marine shoreline areas are mostly residential. Vacant and forestry land uses are also common. Docks and piers are scattered throughout the marine environment with private marinas concentrated along Hood Canal. The only major industrial area in the County is located on Oakland Bay in the City of Shelton.
- Water-dependent uses in Mason County include docks, piers, boat launches, marinas, commercial aquaculture, and bridges. Single family residential docks are the most common water-dependent use on the county's shorelines. Commercial aquaculture is an important and growing water-dependent industry.
- Much of the upper watersheds within Mason County are managed forest lands, in either private or public ownership, which have historically been logged. This is especially true within WRIA 22. Lower areas in the watershed contain agricultural resource lands. Downstream issues with sedimentation, erosion, high water temperatures and nutrient loading are oftentimes related to timber harvest and agricultural uses outside of the shoreline jurisdiction.

Reach sheets were developed for the report that characterize segments of shoreline waterbodies in a two-page "sheet." The information summarized in the reach sheets establishes a generalized rather than a definitive baseline of existing conditions. The reach sheets are intended to guide review of existing County shoreline environment designations.

For example, Hope Island is currently designated by the 1988 SMP as **Conservancy**. In order to evaluate whether this designation is appropriate, one step would be to review the information in the applicable reach sheet (Chapter 5 of the Inventory and Characterization Report, Reach 35). The reach sheet for Hope Island states that:

- 44% of shoreline is mapped as a landslide hazard area
- Nearshore Process Degradation classifies shoreline as Not Degraded
- Sand lance spawning habitat, hardshell clam, and kelp beds are present
- 93% of shoreline mapped as forest or forest cover based on two GIS datasets
- Shoreline modifications are not present
- Shoreline is 100% vacant, mostly in public ownership

Based on the data provided in the reach sheet, a **Natural** designation would be most suitable since ecosystem functions appear minimally altered, habitat values are high and most of the shorelines is both undeveloped and in public ownership.

Preliminary recommendations for changes to the Shoreline Environment Designation will therefore be based upon a combination of factors, including the summary of existing conditions as outlined in the Draft ICR.

What changes are recommended to the current SEDs?

In the context of findings in the Mason County Shoreline Inventory and Characterization report, we reviewed the County's existing shoreline environment designations and the recommended designation system in the Ecology guidelines (173-26-211(5)). Given the existing uses and functions of the shorelines in the County, we suggest the following adjustments to the designation system in the SMP.

1. **Retain the Natural, Urban Residential, Urban Commercial, Rural and Conservancy designations**, but revise the designation criteria and purpose statement to make sure they are clear and effective at supporting the purposes of the SMA, meet the Ecology shoreline guidelines as well as support the vision of Mason County. Limit the application of the Urban Residential and Urban Commercial designations to UGAs, Hamlets and RACs in order to be consistent with Ecology Guidelines. Due to the range of potential shoreline uses in UGAs, we recommend that the two Urban designations be retained. Limit the application of Rural to areas outside UGAs, Hamlets and RACs dominated by agriculture, large lot residential, tree farms, or moderately-intensive recreation. Conservancy could be best applied to areas dominated by forestry and low-intensity recreation that are adjacent to landslide or erosion hazard areas, feeder bluffs, wetlands or other critical areas. The purpose and designation criteria of the conservancy designation would need to be reviewed to ensure protection of ecological functions and conservation of existing natural resources and valuable historic and cultural areas.
2. **Delete the Urban Industrial designation** since this designation is currently applied only to Shelton Harbor, within Shelton city limits. Since the City of Shelton will be undergoing their own SMP update process and reviewing City shoreline environment designations, the Urban Industrial designation is no longer necessary to be included in the Mason County SMP.
3. **Create a new Rural Residential designation** for densely developed residential areas outside UGAs, Hamlets and RACs.
4. **Create Aquatic and Priority Aquatic designations** and apply to all lands waterward of the ordinary high water mark. Aquatic designations would apply to most in-water shoreline areas in the County. Priority Aquatic would apply to areas that have the highest value for marine and freshwater in-water habitat. These two designations would replace the current County system of designating in-water areas based on depth (e.g., one fathom to ten fathoms), land use (log storage and booming), and upland designation. This would help to simplify the designation criteria while still providing appropriate protections and allowances, consistent with the SMA and state recommendations. These two designations are also proposed by Jefferson County in its Draft SMP update.
5. For all environments, refine the designation criteria to better align with the data available from the inventory so that the designations can be consistently applied across the county.

How do we assign the new SEDs to specific locations in Mason County?

Figure 1 is a flowchart showing the logical order in which SEDs could be assigned, following the recommendations above, and using data from the Draft ICR to establish SED. The process begins with selecting Aquatic areas, and on through Rural Conservancy, the default designation recommended in the WAC. The criteria listed for each designation are described in more detail in Table 3 following the flowchart.

The criteria in Table 3 were developed based on existing criteria per the 1988 SMP, Ecology guidelines, and inventory findings. The changes are designed to accomplish the realignment in SEDs as recommended above, reduce redundancy, and provide more specific criteria that refer to data available in the inventory. For some designations, primary and secondary criteria are provided. The primary criteria are intended to be used initially to designate shorelines. The secondary criteria would be used only when there are shoreline areas that could be designated with two or more designations. The secondary criteria can be seen as serving as a *tie-breaker*.

Flowchart: Preliminary designation of shoreline environments for Mason County – September 2011

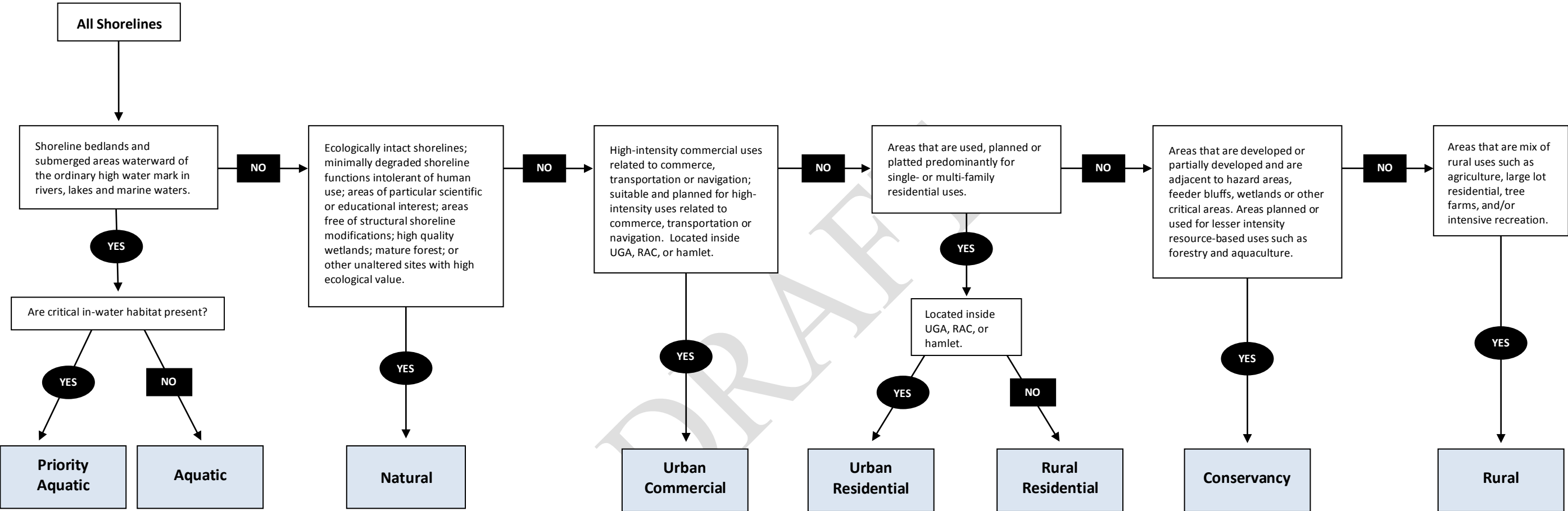


TABLE 3: DESIGNATION CRITERIA FOR PRELIMINARY SHORELINE ENVIRONMENT DESIGNATIONS

Shoreline Environment Designation	Proposed Criteria	Example Areas
Priority Aquatic	<p>The Priority Aquatic designation is assigned to the streams and nearshore areas with the highest priority fish habitats and/or native shellfish habitats waterward of the ordinary high water mark. These shorelines have one or more of the following qualities:</p> <ul style="list-style-type: none"> • Documented Endangered Species Act (ESA) listed salmonid (streams (bull trout/Dolly Varden, chum salmon, chinook salmon, and steelhead trout) and marine habitats (marine mammal haulouts) that are relatively undeveloped; • Other freshwater shorelines that provide habitat for priority salmonid species (coho, Kokanee, pink, sockeye) and are relatively undeveloped; • High value estuaries that support ESA listed salmonid rearing; • Documented presence forage fish spawning (herring, surf smelt, sandlance); • Kelp and eelgrass beds; or • Important intertidal and subtidal beds of native shellfish (clam, oyster, crab, and geoduck). 	<p>Annas Bay Lynch Cove Hamma Hamma estuary</p>
Aquatic	<p>The Aquatic designation is assigned to all saltwater and freshwater areas waterward of the ordinary high water mark if the area does not meet the criteria for the Priority Aquatic designation.</p>	<p>Mason Lake Oakland Bay</p>
Natural	<p>Primary criteria</p> <p>Shorelines with one or more of the following qualities:</p> <ul style="list-style-type: none"> • Areas that are ecologically intact and perform irreplaceable ecological functions or ecosystem-wide processes; • High value wetland complexes with important ecological functions that have generally intact buffers; • Undisturbed estuaries; • Undisturbed accretional spits; • High quality barrier beach, barrier estuary, deltas; • Feeder bluffs that have no existing development above or below the slope, or development is sufficiently set back from the top of slope that the slope can function normally without endangering structures; • Cold water inputs and springs that have been identified to be critical for salmonid habitats; • Areas that are critical for the support of priority wildlife species (waterfowl concentrations, bald eagle habitat); or • Areas with which Federal or State endangered, threatened and sensitive species of wildlife have a primary association. <p>Secondary criteria</p> <p>Shorelines with one or more of the following qualities:</p> <ul style="list-style-type: none"> • Areas that are predominately free from structural shoreline modifications, overwater structures, extensive development and forestry uses; • Forested riparian areas predominantly composed of native vegetation with diverse plant communities, multiple canopy layers, and the presence of large woody debris available for recruitment to adjacent water bodies; • Areas of particular scientific and educational interest; or • PSNERP nearshore degradation score of <i>least degraded</i>. 	<p>Lilliwaup swamp Hope Island Hamma Hamma River</p>

Shoreline Environment Designation	Proposed Criteria	Example Areas
Urban Commercial	Areas inside UGA, RACs or Hamlets and which meet one or more of the following: <ul style="list-style-type: none"> Existing or planned high intensity commercial land uses in already developed areas; or Areas developed with water-dependent commercial uses requiring frontage on navigable waters. 	Area zoned Village Commercial along Case Inlet in Allyn UGA
Rural Residential	Areas outside UGA, RACs and Hamlets and which meet one or more of the following: <ul style="list-style-type: none"> Areas that are predominantly developed with single-family or multifamily residential development; Areas planned and platted for residential development, but are not predominantly characterized by landslide or erosion hazard areas, feeder bluffs, channel migration zones, or floodplains; Areas with a proliferation of docks/piers and structural armoring; Areas developed with or planned for highly intensive recreational uses (e.g., marinas, boat launches); or PSNERP nearshore degradation score of <i>moderate to most degraded</i>. 	Lake Wooten Haven Lake Maggie Lake Panther Lake Portions of Lake Cushman Mason Lake
Urban Residential	Areas inside UGA, RACs or Hamlets and which meet one or more of the Rural Residential criteria.	Island Lake Lake Anderson
Conservancy	<p>Primary criteria</p> <p>Shorelines with one or more of the following qualities:</p> <ul style="list-style-type: none"> Developed or partially developed areas that are adjacent to landslide or erosion hazard areas, feeder bluffs, wetlands or other critical areas; Areas that are currently supporting resource-based uses, such as forestry or aquaculture; Areas designated as forestry lands; or Bluff-backed beaches. <p>Secondary criteria</p> <p>Shorelines with one or more of the following qualities:</p> <ul style="list-style-type: none"> Currently supporting or can support low-intensity recreational activities (e.g., small campgrounds, unpaved trails); Currently supporting or can support low-intensity water-dependent uses; High recreational value or with unique historic or cultural resources; or PSNERP nearshore degradation score of <i>less degraded</i>. 	The majority of freshwater rivers in WRIA 22 Johns Creek Tahuya River
Rural	Areas outside UGA, RACs and Hamlets. Shorelines with one or more of the following qualities: <ul style="list-style-type: none"> A mix of uses including agriculture, large lot residential, tree farms, and/or moderately intensive recreation (RV or tent campgrounds, paved trails, day-use parks); Developed or partially developed areas that are adjacent to channel migration zones or floodplains; or Areas designated as agricultural lands. 	Lower reaches of Skokomish River Mill Creek Portions of Harstine Island

Conclusions

Ecology Guidelines include recommended designations but allow communities to retain their current environment designations or establish a different designation system, provided it is consistent with the purposes and policies of WAC 173-26-211(4) (Alternative Systems) and WAC 173-26-211(5) (The Designations) (WAC 173-26-211(4)). We recommend Mason County retain five of the six existing shoreline environment designations for this SMP update: 1) Natural, 2) Conservancy, 3) Rural, 4) Urban Residential, and 5) Urban Commercial. Removing the Urban Industrial designation from the Mason County SMP is recommended because it is currently applied only to Shelton harbor within Shelton city limits and there are no industrially zoned lands outside Shelton where it would reasonably apply. Determining an appropriate designation in Shelton is best addressed under the City's SMP update. We have also suggested the use of three new designations: 1) Rural Residential, 2) Aquatic and 3) Priority Aquatic. The recommended in-water designations would simplify the current County system of applying designations according to depth, land use, and adjoining designation. Application of the Aquatic and Priority Aquatic designation are recommended to be based instead on existing ecological functions and processes.

This memorandum therefore recommends the use of eight (8) shoreline environment designations within Mason County shorelines. These environment designations are ordered below based upon future land use intensity anticipated in the County from least to most intensive:

- Natural;
- Priority Aquatic;
- Aquatic;
- Conservancy;
- Rural;
- Rural Residential;
- Urban Residential; and
- Urban Commercial.

Feedback will be obtained from the JTAC and Mason County CAC on the recommended designation system and the designation criteria during the month of September. Shorelines in one area of Mason County will be mapped according to the designation criteria of the preliminary shoreline environment designations as a trial. These mapped shorelines will be reviewed by the JTAC and Mason County CAC during the month of October. Any necessary revisions to the designation system and criteria will be made at that time. Preliminary shoreline environment designations will then be applied to all Mason County shorelines. Once the shorelines have been mapped, draft goals and policies for each environment will be prepared.