

**ADDENDUM TO ATTACHMENT A: FINDINGS AND CONCLUSIONS
FOR THE PROPOSED COMPREHENSIVE UPDATE TO THE PACIFIC COUNTY
SHORELINE MASTER PROGRAM (Ordinance No. 183)**

Pacific County's December 12, 2017 response to Ecology's September 28, 2017 decision
Ordinance No. 183, adopted December 12, 2017
Prepared by Kim Van Zwalenburg, January 2, 2018

Brief Description of Proposed Amendment: Pacific County (County) submitted a comprehensive update to their Shoreline Master Program (SMP). On September 28, 2017, the Department of Ecology (Ecology) approved the County's SMP, subject to the County's acceptance of six required changes. In response to Ecology's conditional approval, the County adopted Ordinance No. 183 on December 12, 2017 accepting four of Ecology's required changes and proposing alternative language for changes #2 and #3. The County has also suggested alternatives to six of Ecology's recommended changes.

FINDINGS OF FACT

Required Changes: As provided in the County's response to Ecology through Ordinance No. 183, Pacific County accepted Required Change Nos. 1, 4, 5 and 6. Alternative language to Required Change Nos. 2 and 3 are outlined in Revised Attachment B.

- **#2 - Table 3-1 Waterbodies in Shoreline Jurisdiction:** Ecology's changes identified clarifications needed in the list of waterbodies. The County's alternatives include additional corrections.
- **#3 - Section 3.4 Official Shoreline Maps:** Ecology's change clarifies that the maps are part of the SMP. The County adds additional language identifying where the maps are held.

Recommended Changes: Per Ordinance No. 183, the County accepted all but one (#7) of Ecology's Recommended Changes. Minor revisions were made to six recommended changes as shown below and outlined in Revised Attachment C.

- **#11 - Table 5-1 Footnotes:** Ecology recommended reorganizing the footnotes in the table so they are in sequential order. The County alternative identified three additional minor corrections.
- **#14 - Table 5-1 Footnote 26:** This change identifies an ordinance number correction. The County includes a correction to the title of the referenced ordinance.
- **#15 - Section 5.5.A, Aquaculture – Policies:** This change adds the word "significantly" to Policy 2. The County's alternative improves the grammar of the sentence.
- **#19 - Section 5.17.B:** The change identifies an ordinance number correction. The County includes a correction to the title of the referenced ordinance.

- **#20 - Section 5.19 Residential Development:** Ecology recommended the County consider including language to specifically address residential beach access structures. The County concurs and includes a regulation to address these developments.
- **#29 - Global corrections:** Ecology recommended final edits to ensure citations, formatting and typographical errors. The County’s response itemizes the identified edits.

Ecology finds that Pacific County has accepted all Required and Recommended changes except Recommended Change #7 and has provided alternatives to Required Change Nos. 2 and 3 and Recommended Change Nos. 1, 14, 15, 19, 20 and 29.

CONCLUSIONS OF LAW

Ecology concludes that consistent with RCW 90.58.090(2)(e)(ii), Pacific County’s proposed alternative language provided in Attachment B-Revised and Attachment C-Revised is consistent with the Shoreline Management Act, the SMP Guidelines (WAC 173-26) and the purpose and intent of Ecology’s original changes identified in Ecology’s September 28, 2017 conditional approval.

DECISION AND EFFECTIVE DATE

Ecology approval of Pacific County’s comprehensively updated SMP is effective fourteen (14) days from the date of the Ecology Director’s letter notifying the County of final approval.