

ISLAND COUNTY SHORELINE MASTER  
PROGRAM UPDATE

**Preliminary Shoreline Environment  
Designation Criteria**

DRAFT October 2011



## **SHORELINE ENVIRONMENT DESIGNATIONS (SEDs)**

### **What are SEDs?**

Shoreline environment designations (SEDs) comprise a system of categorizing shorelines that allows shorelines with similar characteristics to be managed and regulated according to similar objectives and standards. In order to plan and effectively manage shoreline resources, the Department of Ecology developed guidelines [Washington Administrative Code (WAC) 173-26-211] for establishing SEDs to be used by local governments in the preparation of shoreline master programs. The current SEDs in Island County generally follow the model recommended by Ecology and are a type of regulatory overlay that applies in addition to underlying zoning.

### **Do the current SEDs have to be changed?**

Although it is not required to use the specific designations recommended in WAC 173-26-211, jurisdictions are required to review their designations to determine whether they are appropriate for meeting the requirements of the Shoreline Management Act (SMA). In addition, changes in jurisdiction and land uses that have occurred since the 1998 update of the Island County SMP, make it appropriate to revise the designations to a limited degree. Those changes include elimination of the three incorporated areas from County shoreline jurisdiction due to adoption of individual programs for the City of Oak Harbor, Town of Coupeville, and the City of Langley, and development of critical areas regulations that must be incorporated into the SMP and that duplicate some of the functions of the existing SEDs. In addition, preparation of an updated shoreline inventory of ecological conditions allows more consistent application of designation criteria.

### **What are the current SEDs in Island County?**

In Island County, the six existing designations are 1) Natural; 2) Rural; 3) Aquatic; 4) Urban; 5) Conservancy; and 6) Shoreline Residential. There is also a sub-category, Aquatic-Conservancy that is designating a critical biological area within the aquatic zone in Utsalady Bay on Camano Island. Table 1 provides a brief synopsis of the purpose of each of these existing shoreline environment designations.

The designation criteria are discussed in further detail following the recommendations regarding designation titles and purpose statements.

**Table 1. Existing Island County shoreline environment designations**

<i>Designation</i>	<i>Purpose</i>
Natural	Preserve, protect, and restore those natural features and resources valuable in their natural or original condition by requiring severe restrictions on intensities and types of uses, thus allowing them to continue in their natural state.
Rural	Protect prime farm land as well as other historically rural areas from high intensity commercial, industrial and residential development.
Aquatic	Ensure protection and appropriate use of aquatic resources, protect and encourage multiple water-dependent uses, when such uses are compatible with each other and with uses in the adjoining shoreline environment.
Aquatic-Conservancy	Protect valuable fisheries resources that are held in public trust from degradation.
Urban	Ensure optimum County benefits through appropriate intensive development that also enhances the shoreline area.
Conservancy	Protect, conserve, and manage harvestable natural resources, as well as aesthetic, cultural, ecological, historic, and recreational areas in order to achieve a continuous flow of sustained yield resource utilization.
Shoreline Residential	Allow for the continuation of residential use and development.

**What do the Guidelines in WAC 173-26-211 say about establishing SEDs?**

When establishing shoreline environment designations WAC 173-26-211 requires the designations to be based on:

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

WAC 173-26-211 describes six different environmental designations. For each environment, a purpose statement and general criteria for designation are recommended. Table 2 provides a brief synopsis of the purpose of each of these recommended designations.

**Table 2. Recommended shoreline environment designations from WAC 173-26-211**

<i>Designation</i>	<i>Purpose</i>
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. Very low intensity uses allowed to maintain ecological functions and ecosystem-wide processes.
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. Appropriate uses include low-impact outdoor recreation, timber harvesting on a sustained-yield basis, agriculture, aquaculture, low-intensity residential development.
Aquatic	Protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark.
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.
Urban Conservancy	Within UGAs, protect /restore ecological functions of open space, floodplain & other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses.
Shoreline Residential	Accommodate residential development and appurtenant structures that are consistent with the SMA, and provide for appropriate public access and recreational uses.

**What changes are recommended to the current SED titles and purpose statements?**

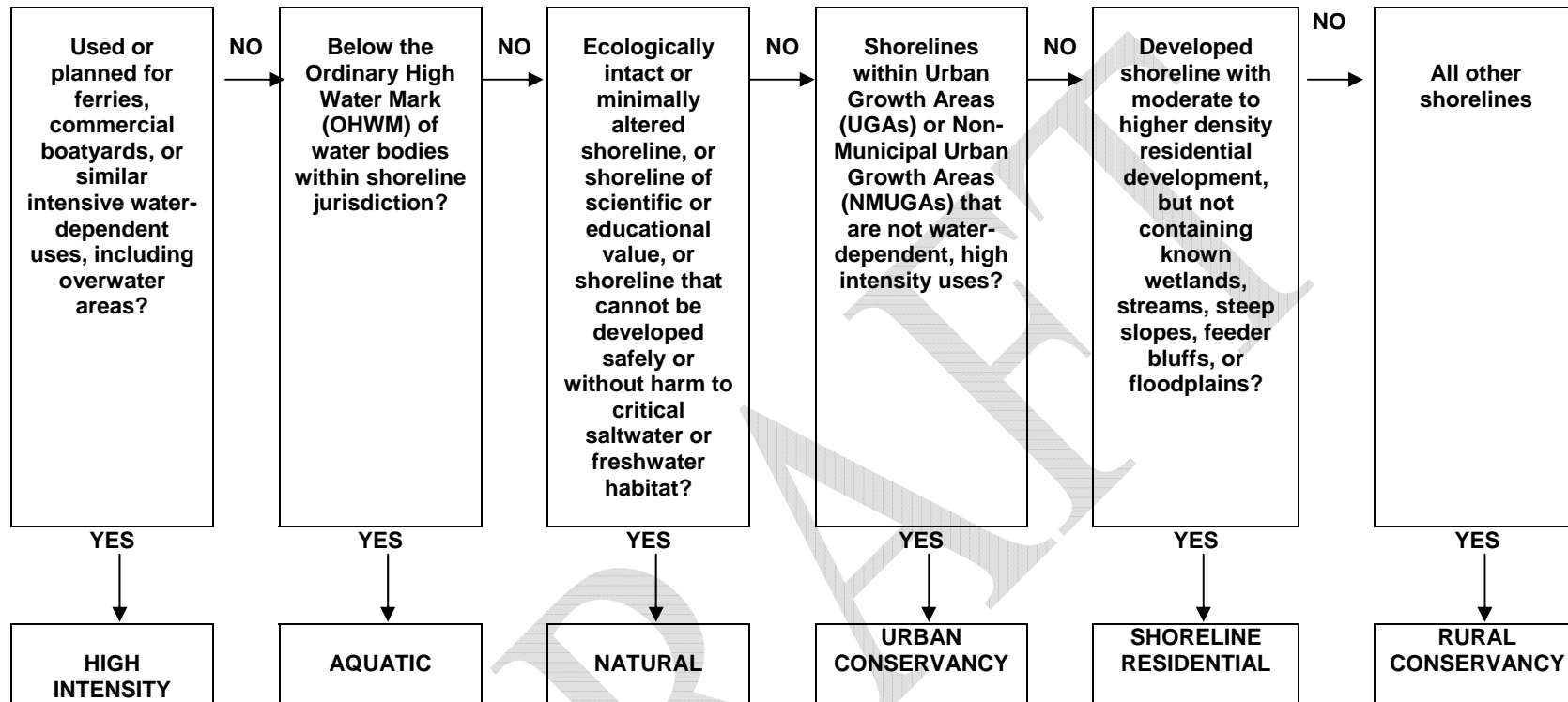
1. Retain the Natural, Aquatic, and Shoreline Residential designations, but review the purpose statement to ensure that they are clear and effective at supporting the purposes of the SMA as well as the vision for shorelines in Island County.
2. Because all portions of the shoreline within incorporated areas are now outside of County jurisdiction, and because this includes most of the existing Urban designation in the Island County SMP, eliminate the Urban designation. The two shoreline areas within urban growth boundaries are appropriate for an Urban Conservancy designation, and include a small area in the Langley UGA and an area of shoreline in Freeland that is designated a Non-Municipal Urban Growth Area (NMUGA).
3. Designate areas currently outside of incorporated areas that support ferries, and commercial boatyards as High Intensity, to allow management of these areas in a manner that supports these water-dependent uses while providing adequate protection of shoreline ecology.
4. Because the stated purpose of the current Rural designation is not one of the objectives of the SMA and is better accomplished through zoning, eliminate the Rural designation.
5. Create a Rural Conservancy designation that has as its purpose protection of ecological functions, and conservation of existing natural resources and valuable historic and cultural areas in order to provide for sustained resource use, achieve natural floodplain processes, and provide recreational opportunities.
6. Because the purpose of the current Aquatic-Conservancy sub-designation is to protect fishery resources and these resources must be protected in all aquatic habitats, the sub-designation is not needed. Specific issues related to critical habitat areas can and must be addressed through critical saltwater habitat policies and regulations.
7. 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.
8. Consider parallel shoreline environment designations on areas landward of the ordinary high water mark to protect critical areas such as geologically hazardous areas and habitat areas that are relatively intact but may be separated from the shoreline by development.

**How would the new SEDs be applied?**

Figure 1 on the following page is a flowchart showing the logical order in which shoreline environment designations would be assigned, following the recommendations in the previous section, and using data from the inventory to establish SED boundaries. The process begins with selecting High Intensity areas (which may include both in-water and shoreland areas), then the remainder of the Aquatic areas, and on through Rural Conservancy, the default designation recommended in the WAC.

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Figure 1. Designation Criteria Flow Chart



**Criteria Definitions:**

Planned for ferries, commercial boatyards and similar intensive water-dependent uses, including overwater areas: Sites adjacent to existing ferries, commercial boatyards and similar intensive water-dependent uses that are currently zoned to support intensive commercial or transportation uses. Overwater areas means the submerged portion of a parcel supporting the listed uses, and any tidelands leased for such uses or planned to be leased for such uses.

Ecologically intact or minimally altered shoreline: Sites generally free from structural shoreline modifications, structures, roads, and agricultural uses, or that have the potential to regain natural conditions with minimal or no restoration activity.

Critical saltwater or freshwater habitat: Definitions for these habitats are provided in WAC 173-26-221(2) and include kelp beds; eelgrass beds; spawning and holding areas for forage fish, such as herring, smelt and sand lance; subsistence, commercial and recreational shellfish beds; mudflats, intertidal habitats with vascular plants; and areas with which priority species have a primary association. Priority species are defined in WAC 173-26-020 and include state listed and proposed species; vulnerable aggregations; species of recreation, commercial or tribal importance; and species listed under the federal Endangered Species Act as proposed, threatened, or endangered.

Moderate to higher density residential development: Developed density of more than one unit per acre.

The following tables propose criteria for each of the proposed Shoreline Environment Designations. The most closely correlated criteria from the current SMP are provided for comparison, along with the associated guidance from the WAC. The last column in each table provides an explanation for each proposed change. These changes are intended to provide greater consistency with the WAC and clarify which areas are to be designated by naming more specific criteria that refer to data available in the updated inventory.

**Table 3. High Intensity Designation Criteria**

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<b>High Intensity</b>	<i>(From Urban designation)</i>		
A. Areas that currently support water-dependent, high-intensity uses related to commercial boatyards, transportation or navigation, or are suitable and planned for high-intensity water-oriented uses.	1. Areas of high density residential, commercial and industrial use.  Note: One major difference between the Urban designation in the current SMP and the WAC criteria for High Intensity residential use is not included in the latter since it is not a water-oriented use.	Assign a "high-intensity" designation to shoreline areas within incorporated municipalities, urban growth areas, and industrial or commercial "limited areas of more intensive rural 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.	A High Intensity designation focused on high intensity water-oriented uses that require substantial modification of the shoreline allows management of these very limited areas with a set of policies and regulations that acknowledge the need to modify the environment, while ensuring that critical habitat areas are avoided to the greatest extent possible, and that impacts are minimized and mitigated adequately.
	2. Areas of lower density subject to pressures for development within the near future.		The single criterion described captures areas planned for high-intensity water-oriented uses.
	3. Areas designated Urban under local Comprehensive Plans.		Designation in the Comp Plan as Urban does not imply the need to allow high intensity water-oriented use; within UGAs and NMUGAs, shoreline residential or urban conservancy may be appropriate.

**Table 4. Aquatic Designation Criteria**

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<b>Aquatic</b>	<i>(From Aquatic designation)</i>		
A. All saltwater areas waterward of the ordinary high water mark, including estuarine channels and coastal lagoons, other than those designated High Intensity.	1. All marine water areas seaward of the ordinary high water mark, including estuarine channels and associated marshes, bogs, and swamps.	Assign an "aquatic" environment designation to lands waterward of the ordinary high-water mark.	The proposed designation focuses on the open water areas for aquatic designation, allowing policies to focus on potential conflicts between uses that need open water and ecological impacts those uses may have.
B. All SMA lakes (>20 ac.) below the ordinary high water mark.	2. All lakes subject to this program below the ordinary high water mark.	Same as above	No change proposed.
	3. Regulated Wetlands which have not been designated in other environment [sic].	Wetlands are not part of the Aquatic environment criteria in the WAC.	Associated wetlands may be present in any shoreline environment, but are typically landward of the OHWM so are designated a type of shoreland designation.

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<p>Not recommended as a separate SED subdesignation.</p>	<p><i>(from Aquatic-Conservancy)</i></p> <ol style="list-style-type: none"> <li>1. The area supports a population of a protected species that not only consistently reproduces itself, but, because of favorable environmental conditions, provides a major source of recruitment for adjacent areas or regions whose populations do not consistently reproduce themselves.</li> <li>2. The area consists of a habitat type or types that provide shelter, food, or other environmental necessities during a critical part of the protected species' life cycle.</li> </ol>	<p>This SED “subdesignation” is not correlated with WAC Guidelines for Aquatic environment, but the criteria used are similar to critical saltwater habitat.</p>	<p>We recommend eliminating the Aquatic-Conservancy subdesignation because:</p> <ol style="list-style-type: none"> <li>a) The SMP will include standards for all critical saltwater habitats that preserve habitat functions for protected species.</li> <li>b) Protecting critical saltwater habitats as a critical area allows more flexible management, with the ability to respond to both changes in listings and changes in species, without the need to change the environment designations.</li> </ol>

**Table 5. Natural Designation Criteria**

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<b>Natural</b>	<i>(From Natural designation)</i>		
A. Areas that are generally free from shoreline modifications, structures, roads, and significant agricultural uses, or have the potential to regain natural conditions with minimal or no restoration activity.	<ol style="list-style-type: none"> <li>1. Areas where human influence and developments are minimal.</li> <li>2. Areas designated as “Natural Environment” should be free from development, or capable of being restored to natural condition.</li> </ol>	<p>(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; Footnotes 2 and 4: Generally, but not necessarily, ecologically intact shorelines are free of structural shoreline modifications, structures, and intensive human uses, or capable of being restored to natural condition.</p> <p>Footnote 4: Areas with significant existing agriculture lands should not be included in the "natural" designation.</p>	<p>This revised criterion provides more specific information to base a designation on, while adhering to the same general principal of the existing designation criteria. Significant agricultural uses are recommended to not be included in Natural designation, as it is assumed that they would not be expected to be capable of being easily restored.</p>
B. For areas designated due to presence of habitat features, the designated areas should be large enough to protect the value of the habitat resource.	<ol style="list-style-type: none"> <li>3. Areas designated as Natural Environment should be large enough to protect the value of the resource.</li> </ol>	<p>Footnote 3: The term "ecologically intact shorelines" applies to all shoreline areas meeting the above criteria ranging from larger reaches that may include multiple properties to small areas located within a single property.</p>	<p>The size criterion is appropriate for areas that are included due to habitat value, but not for areas that are considered undevelopable for other reasons.</p>
C. Areas critical for the support of threatened or endangered species.	<ol style="list-style-type: none"> <li>4. An area utilized by wildlife (especially rare, diminishing or endangered species) that provides food, water, or cover and/or protection.</li> </ol>	<p>See (A) above</p>	
D. Areas of waterfowl concentration.	<ol style="list-style-type: none"> <li>5. A seasonal haven for concentration of native animals such as constricted migration routes.</li> </ol>	<p>See (A) above</p>	

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<p>E. The shoreline, whether minimally disturbed or intact, represents an ecosystem type or geologic feature that is of particular scientific and/or educational interest.</p>	<p>6. Areas representing the basic ecosystem and geologic types.                      7. Ecotones, transition types, and other areas representing deviation from the basic ecological and geological norms but which are of value.                      8. Areas which best represent undisturbed nature.                      9. Areas which contain unique or scientifically important features which are especially amenable to manipulation, or which contain important rare and/or endangered species.</p>	<p>(B) The shoreline is considered to represent ecosystems and geologic types that are of particular scientific and educational interest;</p>	
<p>F. 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; associated wetlands with generally intact buffers; saltmarsh areas that are intact or, if previously used for agriculture, are capable of being restored; feeder bluffs without existing development above or below the slope, or development that is sufficiently set back from the top of slope so that the slope can function normally without endangering structures; undisturbed estuaries or accretional spits.</p>	<p>10. Areas which play an important part in maintaining the ecological balance of the region.</p>	<p>See (A) and (B) above</p>	

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
G. Areas unable to support new development or uses without significant adverse impacts to ecological functions, or that possess serious development limitations or human health and safety risks due to the presence of environmental hazards related to flooding, erosion or landslides and similar occurrences.		(C) The shoreline is unable to support new development or uses without significant adverse impacts to ecological functions or risk to human safety.	
	11. Areas rich in variety and/or quantity of life forms.	See (A) above	Omitted because it is vague (almost anywhere could be considered rich in a variety of life forms- native or non-native) and the primary concern is adequately covered in the other habitat criteria.
	12. Areas important to the maintenance of the natural quality and flow of the water.	See (A) above	Omitted because it is vague (almost anywhere could be considered rich in a variety of life forms- native or non-native) and the primary concern is adequately covered in the other habitat criteria.
	13. Wildlife habitat areas within populated areas, where people can view or become knowledgeable about wildlife.	See (B) above	Omitted because it is adequate covered by the scientific and educational value criterion above.
	14. Areas with histories of scientific research.	See (B) above	Omitted because it is adequate covered by the scientific and educational value criterion above.
	15. Those areas having a high scenic value in their natural state.	Not correlated with WAC guidelines for Natural Designation	Omitted because areas in a natural state are included making this criterion redundant.

Complete text of footnotes (From WAC 173-26-211):

1. Such shoreline areas include largely undisturbed portions of shoreline areas such as wetlands, estuaries, unstable bluffs, coastal dunes, spits, and ecologically intact shoreline habitats. Shorelines inside or outside urban growth areas may be designated as "natural."
2. Ecologically intact shorelines, as used here, means those shoreline areas that retain the majority of their natural shoreline functions, as evidenced by the shoreline configuration and the presence of native vegetation. Generally, but not necessarily, ecologically intact shorelines are free of structural shoreline modifications, structures, and intensive human uses. In forested areas, they generally include native vegetation with diverse plant communities, multiple canopy layers, and the presence of large woody debris available for recruitment to adjacent water bodies. Recognizing that there is a continuum of ecological conditions ranging from near natural conditions to totally degraded and contaminated sites, this term is intended to delineate those shoreline areas that provide valuable functions for the larger aquatic and terrestrial environments which could be lost or significantly reduced by human development. Whether or not a shoreline is ecologically intact is determined on a case-by-case basis.
3. The term "ecologically intact shorelines" applies to all shoreline areas meeting the above criteria ranging from larger reaches that may include multiple properties to small areas located within a single property.
4. Areas with significant existing agriculture lands should not be included in the "natural" designation, except where the existing agricultural operations involve very low intensity uses where there is no significant impact on natural ecological functions, and where the intensity or impacts associated with such agriculture activities is unlikely to expand in a manner inconsistent with the "natural" designation.

**Table 6. Urban Conservancy Designation Criteria**

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<b>Urban Conservancy</b>	<i>(From Urban designation)</i>		
<p>Areas inside urban growth areas, as defined in RCW 36.70A.110, if any of the following characteristics apply:</p> <p>(A) They are suitable for water-related or water-enjoyment uses;</p> <p>(B) They are open space, flood plain or other sensitive areas that should not be more intensively developed;</p> <p>(C) They have potential for ecological restoration;</p> <p>(D) They retain important ecological functions, even though partially developed; or</p> <p>(E) They have the potential for development that is compatible with ecological restoration.</p>	<ol style="list-style-type: none"> <li>1. Areas of high density residential, commercial and industrial use.</li> <li>2. Areas of lower density subject to pressures for development within the near future.</li> <li>3. Areas designated Urban under local Comprehensive Plans.</li> </ol>	<p>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 "limited areas of more intensive rural development"</p> <p>(A) They are suitable for water-related or water-enjoyment uses;</p> <p>(B) They are open space, flood plain or other sensitive areas that should not be more intensively developed;</p> <p>(C) They have potential for ecological restoration;</p> <p>(D) They retain important ecological functions, even though partially developed; or</p> <p>(E) They have the potential for development that is compatible with ecological restoration.</p>	<p>The current Urban designation was established to apply to incorporated urban areas, which are now under separate SMPs. Areas of high density use should be designated High Intensity or Shoreline Residential.</p> <p>The County's UGAs and NMUGA have residential, commercial, and recreational development, and meet the criteria for a conservancy type designation, but should not be included in the Rural Conservancy designation because they generally exhibit and will continue to develop at a more urban intensity.</p> <p>The guidelines also suggest that commercial or industrial "limited areas of more intensive rural development" (RAIDs) could be designated Urban Conservancy, but the only areas within designated RAIDs that have commercial or industrial uses have water-dependent uses and are designated High Intensity.</p>

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
		<p>Lands that may otherwise qualify for designation as urban conservancy and which are designated as "mineral resource lands" pursuant to RCW 36.70A.170 and WAC 365-190-070 may be assigned a designation within the "urban conservancy" environment that allows mining and associated uses in addition to other uses consistent with the urban conservancy environment.</p>	<p>This criterion from the guidelines does not have a corresponding designation criterion in the current SMP. There do not appear to be any lands meeting this criterion in the County, so it has been omitted.</p>

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**Table 6. Shoreline Residential Designation Criteria**

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<b>Shoreline Residential</b>			
A. Areas inside urban growth areas, as defined in RCW 36.70A.110, "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, but are not predominantly wetlands, stream corridor, or annually flooded.	<ol style="list-style-type: none"> <li>1. Those shoreline areas having a higher density of housing than the Rural Environment.</li> <li>2. Areas which are tolerant of the physical modifications necessary to accommodate residences.</li> </ol>	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.	This criterion combines two current criteria to more closely define "higher density", and areas that are generally not tolerant of modifications necessary to accommodate residences. This is consistent with the WAC criteria for areas that are planned for residential development, since current County regulations prohibit such development in the critical areas mentioned.
B. Areas that are legally subdivided for residential use at a density of one or more units per acre and are not constrained by inadequate water supply and the inability to dispose of sewage due to soil conditions or lot sizes.	<ol style="list-style-type: none"> <li>3. Areas which are legally subdivided for residential use.</li> </ol>	... planned and platted for residential development.	Since residential use is allowed on many sizes of lots, the criterion refines the definition to a higher density. However, platted areas that have water supply or septic limitations should not be designated for this higher density type of designation.

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
	4. Areas designated in the adopted plans of public agencies for expansion of residential areas.	... 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.	This existing criterion is omitted because areas designated as RAIDs in the Comprehensive Plan are mentioned in the first criterion.
	5. Areas most appropriately meeting the needs for residential development of the foreseeable future, giving consideration to the areas which can provide the necessary public services, utilities and access to accommodate residents.	... 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.	This existing criterion is omitted because the first criterion adequately addresses the concerns it raises.
C. Areas developed with or planned for moderate to high impact recreational uses.	Not addressed by current criteria.		This criterion is added to address recreational areas that are not appropriate for more restrictive designations like Rural Conservancy or Natural. It is consistent with the purpose of the this designation.

**Table 7. Rural Conservancy Designation Criteria**

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
<b>Rural Conservancy</b>	<i>From current Conservancy designation</i>		
A. The shoreline is generally undeveloped, or 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;	1. Areas containing resources which lend themselves to management on a sustained-yield basis.	(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.	The recommended criterion would recognize recreation and resource-based uses in the shoreline area.
B. The shoreline is supporting human uses but subject to environmental limitations, including steep slopes presenting erosion and slide hazards, wetlands, streams, areas prone to flooding, and/or areas that cannot provide adequate water supply or sewage disposal.	2. Areas possessing valuable natural resources or features which would tolerate only minimal changes in topography or the land/water interface 3. Areas which, in addition to meeting one or more of the other designation criteria, may be characterized by significant environmental constraints to development, including steep slopes presenting erosion and slide hazards, areas prone to flooding, and/or areas which cannot provide adequate water supply or sewage disposal.	(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.	This criterion combines existing criteria 2 and 5 with WAC guidance to indicate areas that have development constraints due to critical areas and/or inadequate infrastructure.

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
C. The shoreline is supporting or can support low impact outdoor recreational activities;	4. Public or community owned areas used for recreation and/or public or community owned areas which have been designated for recreational use.	See (A) above regarding lesser-intensity recreational uses.	This compliments the Shoreline residential areas, which should accommodate higher intensity recreational uses. The existing criterion would place all recreational uses in this designation.
D. The shoreline has aesthetic, cultural, historic, or recreational qualities of regional or statewide importance.	5. An area having aesthetic, cultural, ecological, historic, or recreational qualities of such high regional or statewide significance that inappropriate modification or use would adversely affect such qualities.	(D) The shoreline is of high recreational value or with unique historic or cultural resources;	The simplified language refers to the same group of properties, except that ecological resources were eliminated because those should be covered under the Natural designation.
E. The shoreline is predominantly low density residential use.	Current criteria do not correlate.	(B) The shoreline is currently accommodating residential uses outside urban growth areas and incorporated cities or towns; Also see footnote 1.	This criterion is added to ensure that areas of larger residential lots are included in this designation to maintain a low density, rural residential character.
F. The shoreline has low-intensity water-dependent uses.	Current criteria do not correlate.	(E) The shoreline has low-intensity water-dependent uses.	This criterion is added to ensure that the land areas accommodating uses like small boatyards or marinas are included in this designation.
	<i>From current Rural designation</i>		
	1. Areas used for agricultural purposes.	(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;	Covered by proposed criteria above.

<i>Proposed criteria</i>	<i>Current criteria</i>	<i>Correlated criteria from WAC 173-26-211</i>	<i>Reason for change</i>
	2. Areas not now used for agriculture but where such use would be appropriate and yield optimum County or Regional benefits.	See (A) above.	Covered by proposed criteria above.
	3. Areas modified from their natural vegetative cover and/or surface drainage patterns, but generally with low density development.	See (A) above.	Covered by proposed criteria above.
	4. Areas which form natural buffer zones between areas of higher density land utilization.	Not directly correlated with WAC guidelines.	It is not clear under what circumstances this would be applied, but it appears that the intent would likely be met by applying the criteria above.
	5. Areas in which each lot has at least 165 feet of shoreline frontage.		This criterion is not needed, since the density of Shoreline Residential is defined. This lot width criterion could be used to distinguish Shoreline Residential areas, as a second measure of shoreline density.

Footnotes (from WAC 173-26-211)

1. Assign a "rural conservancy" environment designation to shoreline areas outside incorporated municipalities and outside urban growth areas, as defined by RCW 36.70A.110.
2. Areas designated in a local comprehensive plan as "limited areas of more intensive rural development," as provided for in chapter 36.70A RCW, may be designated an alternate shoreline environment, provided it is consistent with the objectives of the Growth Management Act and this chapter. "Master planned resorts" as described in RCW 36.70A.360 may be designated an alternate shoreline environment, provided the applicable master program provisions do not allow significant ecological impacts.
3. Lands that may otherwise qualify for designation as rural conservancy and which are designated as "mineral resource lands" pursuant to RCW 36.70A.170 and WAC 365-190-070 may be assigned a designation within the "rural conservancy" environment that allows mining and associated uses in addition to other uses consistent with the rural conservancy environment.