

**ADDENDUM NO. 2
TO THE
SHORELINE MANAGEMENT PROGRAM
FINAL SUPPLEMENTAL ENVIRONMENTAL
IMPACT STATEMENT**

**Periodic Review of the Snohomish County Shoreline Management Program (SMP)
Amending the Snohomish County SMP**

Prepared Consistent with

The Washington State Environmental Policy Act of 1971
Chapter 43.21C Revised Code of Washington
Chapter 197-11, Washington Administrative Code
Snohomish County Code Title 30



Snohomish County Planning and Development Services

Date of Issuance: April 24, 2019

FACT SHEET

Project Title:	Shoreline Management Program (SMP) – 2019 Periodic Review
Proposed Non-Project Action:	To address the periodic review requirements for SMPs in state law, the proposed non-project action is to adopt amendments to shoreline administrative provisions in chapter 30.44 of Snohomish County Code (SCC), amendments to shoreline development regulations in chapter 30.67 SCC, and associated amendments to chapters 30.10, 30.22, 30.23, 30.62A and 30.91 SCC, amendments to the shoreline map series depicting the official delineation of the county's shoreline environment designations, and amendments to the <i>Shoreline Management Program: Shoreline Environment Designations, Policies and Regulations</i> document.
Purpose of the EIS Addendum:	<p>This addendum adds information relating to the non-project programmatic county action described above. This information does not result in any new significant adverse environmental impacts and does not change the analysis or the conclusions of previously identified significant impacts within the previously issued SEPA documents: in the Final Environmental Impact Statement (EIS) issued June 2006 and the Final Supplemental EIS issued August 2010.</p> <p>This addendum is being issued in accordance with WAC 197-11-625 and WAC 197-11-630. The adopted environmental documents listed herein, together with this addendum, meet Snohomish County's environmental review requirements for the proposed amendments.</p>
Description of Proposal:	The proposal provides amendments to the Snohomish County SMP that comply with legislative changes to the Shoreline Management Act (SMA) and Department of Ecology (Ecology) updates to shoreline guidelines. The proposed revisions to the county's SMP achieve internal consistency with the Snohomish County Growth Management Act Comprehensive Plan (GMACP) and development regulations in Title 30 SCC and reflect changed circumstances, new information and/or improved data available since the county's last SMP update in 2012. Additional housekeeping amendments included as part of this proposal correct code conflicts and internal inconsistencies.
Location of Proposal:	Unincorporated Snohomish County.

**Action Sponsor
Lead Agency:** Snohomish County Department of Planning and Development Services
3000 Rockefeller Avenue, M/S #604
Everett, Washington 98201-4066

**Required Approval
Review:** Snohomish County Council adoption of an ordinance amending the SMP
and Washington State Department of Ecology approval of SMP
amendments.

**Circulation and
Comment:** This addendum is being sent to all recipients of the previously issued Draft
and Final EIS for the SMP. Consistent with WAC 197-11-625, addenda do
not require a comment period.

**The EIS Addendum
is available by
contacting:** Alison Hodgkin, Project Manager
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Proposed Addendum No. 2 is also available for viewing at the Snohomish
County Department of Planning and Development Services (County
Administration Building West, 2nd Floor) and on the county's website.
Visit www.snoco.org and go to the Planning and Development Services web
page in the search box and select SMP Periodic Review.

Date of Issuance: April 24, 2019

**Responsible
Official:** Barb Mock, Director
Snohomish County Planning and Development Services
3000 Rockefeller Avenue, M/S #604
Everett, Washington 98201-4066

Signature 
Barb Mock, Director

Background

Snohomish County is mandated by the Shoreline Management Act (SMA) to review and update its Shoreline Management Program (SMP) according to a schedule established in RCW 90.58.080. Under this schedule, the county must take action to review and, if necessary, revise its SMP on or before June 30, 2019, and every eight years thereafter. Periodic review is intended to assure that the county's SMP complies with all of the changes to shoreline laws and guidelines that have been adopted since the last time the county updated its SMP in 2012.

The Snohomish County Shoreline Management Program (SMP) consists of: a document titled *Shoreline Management Program: Shoreline Environment Designations, Policies and Regulations*, a map series depicting the official delineation of the county's shoreline environment designations, shoreline development regulations in chapter 30.67 SCC, and critical area regulations in chapters 30.62A, 30.62B, 30.62C and 30.65 SCC.

The scope of this project includes proposed amendments to the shoreline policy document, shoreline map series and shoreline development and critical area regulations that will:

- comply with periodic review requirements in the SMA;
- achieve consistency with changes to the SMA and shoreline guidelines;
- reflect changed circumstances, new information and/or improved data that has become available since the county's last SMP update in 2012;
- result in more effective shoreline management; and
- correct spelling errors, clarify code inconsistencies and improve implementation.

The County and Ecology worked together for several years on the last major review and update of the county's SMP which was approved by Ecology on July 13, 2012, and became effective on July 27, 2012. The 2012 Update of the county's SMP was comprehensive in nature to reflect many changes in the SMA.

Given the last comprehensive update to the county's SMP was in 2012 and considering the absence of significant changes in the SMA since 2012, and monitoring of development has performed as anticipated¹, PDS has determined that major changes to the SMP are not necessary in order to comply with the SMA or to implement existing policies.

2019 Periodic Review focuses primarily on the following minor amendments:

- **Shoreline Maps:** Proposed shoreline regulatory map revisions reflect changes to unincorporated Snohomish County that are new since 2012 resulting from annexations, trust acquisitions and improved Geographic Information System (GIS) data.

¹ See Attachment A, Shoreline Monitoring Assessment

- **Shoreline Policy Document:** Proposed changes to the SMP policy document reflect the map changes described above, specifically revisions to the list of county shorelines in 1.2.1.1 and adjustments to the zoning classification figures in Tables 3 and 4. Other changes include amendments to the appendices (glossary, maps and codes) in the policy document that mirror code amendments in the proposed ordinance.
- **Shoreline Codes:** Proposed amendments to shoreline administrative provisions in chapter 30.44 SCC, shoreline development regulations in chapter 30.67 SCC, and shoreline-related references and definitions in chapters 30.10, 30.22, 30.23, 30.62A and 30.91 SCC.

The adoption of amendments to shoreline maps, shoreline codes in Title 30 SCC and the SMP policy document are a non-project action under the Washington State Environmental Policy Act (SEPA). This Addendum is not intended to satisfy SEPA requirements of individual project actions (the review needed for a future site-specific land use or building permit application).

The proposed amendments to the SMP do not require significant changes to the analysis of impacts and alternatives contained in the Environmental Impact Statement (EIS) prepared in 2006 or the Final Supplemental EIS issued in August 2010, nor does it identify new or significantly different impacts.

Prior Environmental Review

Snohomish County adopted its first shoreline master program in 1974. Since then, the county has made several revisions to the program. In response to new requirements for SMPs adopted by the state in 2003, the county prepared an SMP update in 2004 and published a Final EIS (FEIS) for the 2004 update in June 2006. The county's SMP was revised in 2009 and the county published a Final Supplemental EIS (FSEIS) in August 2010.

EIS Addendum

According to the SEPA Rules, an Addendum to an EIS provides additional analysis and/or information about a proposal or alternatives where their significant environmental impacts have been disclosed and identified in a previous environmental document (WAC 197-11-600(3)(b)(ii)). An Addendum is appropriate when the impacts of the new proposal are the same general types as those identified in the prior document, and when the new analysis does not substantially change the analysis of significant impacts and alternatives identified in the prior environmental documents (WAC 197-11-600(4)(e), WAC 197-11-706).

This Addendum is being issued pursuant to WAC 197-11-625 to meet the county's SEPA responsibility. The county's 2006 FEIS and 2010 FSEIS evaluated plan alternatives, impacts, and mitigation measures that encompass the same general policy direction, land use patterns, socioeconomic, and environmental impacts that are expected to be associated with the proposed amendments identified in this Addendum.

Proposed Action

No additional significant impacts beyond those identified in the county's 2006 FEIS and 2010 FSEIS for the SMP are anticipated. No additional programmatic level environmental review will be required to the extent that the existing environmental documents listed in this addendum or other published documents have analyzed such changes.

Attachment A

Shoreline Monitoring Assessment

As part of 2019 periodic review, the county reviewed project actions in shoreline areas in an effort to assess the effectiveness of the county's SMP and shoreline regulations in Title 30 SCC. The county measured land cover change impacts on properties within shoreline jurisdiction that were issued development permits or had active enforcement cases with recorded critical area site plans (CASPs) between Jun 1, 2013, and Jun 1, 2015. CASPs identify critical area protection areas designated for protection prior to permit issuance.

The county started with 249 CASPs that were recorded within shoreline jurisdiction. Most permit activity was associated with RK (residential) or LDA (land disturbing activity) permits. Shoreline permits were not used as the sole selection criteria due to the exemptions for single family and associated development.

The CASPs were digitized and compared to recent aerial photos from both before and after development. (Note: 52 of the CASPs were recorded too recently such that "after" aerial photos were not yet available. Adjusting for the 52 CASPs that could not be evaluated, the sample size was reduced to 197).

Staff conducted visual comparisons of before and after photos against the CASP looking for site disturbance within the critical area protection areas (CAPA). Following the visual evaluation, the following ratings were assigned:

- INTACT (no disturbance) = 167 sites were developed per CASP requirements
- PARTIALLY INTACT (slight intrusion into CAPA) = 30 sites
- SIGNIFICANT IMPACT (destruction of most or all of the CAPA) = 0 sites

The 197 CASPs contained 321.49 acres of Critical Area Protection Areas (CAPA).

The total CAPA for the 30 sites that received a "partially intact" rating was 28.15 acres.

The total disturbed area within these 30 CAPAs was 1.03 acres, leaving 27.12 acres of CAPA intact.

- Out of a total of 321.49 acres of CAPA, only 1.03 acres, or 0.32%, was disturbed.
- Out of the 30 disturbed CAPAs, only 3.7% of the total CAPA area was disturbed.
- The most common disturbance was construction of small sheds within the CAPA. Driveways, mowed areas and vegetable gardens also were seen to encroach slightly into the CAPAs.

Based on this random sample of a variety of properties with CASPs, critical area protection requirements are being implemented in shoreline jurisdiction and appear to be stable over time.