

Gap Analysis Report - DRAFT

Shoreline Master Program Periodic Review

City of Sequim, Washington

October 2020

Prepared on behalf of:



For:

Barry Berezowsky
Community Development Director
City of Sequim
152 West Cedar Street
Sequim, WA 98382



The Watershed Company Reference Number:
190426



Table of Contents

1. Introduction	1
2. Consistency with Legislative Amendments.....	3
3. Consistency with Critical Areas Ordinance	10
4. Consistency with the Comprehensive Plan & Other Development Regulations/Codes	14
5. Staff Recommendations & Other Issues to Consider	15
6. References	18

List of Tables

	Abbreviations used in this document.	2
Table 1.	Summary of consistency with amendments to state laws and potential	
Table 2.	revisions.	3
Table 3.	Issues to be resolved to integrate the City’s CAO into the updated SMP.	10
Table 4.	Wetland buffer provisions under SMC 18.80/SMP Appendix A and Ecology’s 2018 Guidance.	12
Table 5.	Stream buffer provisions under SMC 18.80/SMP Appendix A and BAS,	
Table 6.	including an updated water typing system.....	13
	Additional issues identified by City staff.....	15

1. Introduction

This document presents the results of the Sequim Shoreline Master Program regulatory and policy gap analysis. In accordance with the Washington State Shoreline Management Act (SMA), local jurisdictions with shorelines of the state are required to conduct a periodic review of their Shoreline Master Programs (SMPs) (WAC 173-26-090). This review is intended to keep SMPs current with amendments to state laws and rules, changes to local plans and regulations, changes in local circumstances, and new or improved data and information.

The City of Sequim (City) adopted its current SMP in November 2013 (Ordinance No. 2014-001 [supersedes Ordinance No. 2012-019]). In the City, shoreline jurisdiction includes all the submerged lands of Sequim Bay from mid-channel to the adjacent shorelands located within 200 feet of the OWHM. The City does not have any streams or rivers that meet shoreline criteria, though the portion of Johnson Creek tidally influenced by Sequim Bay falls within the shoreline jurisdiction. The City's shoreline jurisdiction also includes "shorelines of statewide significance," which are those submerged lands extending from extreme low tide to mid-channel. The SMP includes goals and policies, shoreline environment designations, and development regulations that guide the development and protection of this shoreline area.

As a first step in the periodic review process, The Watershed Company (Watershed) reviewed the current SMP for consistency with legislative amendments by the state made since its last adoption. Watershed staff also reviewed the current SMP for consistency with the policies in the City's Comprehensive Plan, which was most recently amended in 2018. While no gaps in consistency between the two documents were identified, both documents could benefit from clearer cross-referencing and establishment of the relationship between the two of them.

Finally, as the periodic review process represents an opportunity to revise and improve the SMP, Watershed staff reviewed the current SMP for overall usability and provided recommendations on other items for future consideration.

The purpose of this gap analysis report is to provide a summary of this review and to inform updates to the SMP. The report is organized into the following sections according to the content of the review:

- **Section 2** identifies gaps in the SMP's consistency with legislative amendments. This analysis is based on a list of amendments between 2007 and 2019, as summarized by the Washington State Department of Ecology (Ecology) and provided to the City as a Periodic Review Checklist.

- **Section 3** identifies gaps in consistency of the SMP with the City’s Critical Areas Ordinance (CAO) (SMC Chapter 18.80). The SMP currently references an outdated version of the CAO, which was most recently updated in 2017.
- **Section 4** identifies gaps in consistency with the City’s Comprehensive Plan, and with implementing sections of the City’s development regulations other than the CAO.
- **Section 5** identifies other issues to consider as part of the periodic review process.

This report includes several tables that identify potential revision actions. Where potential revision actions are identified, they are classified as follows:

- **“Mandatory”** indicates revisions that are required for consistency with state laws.
- **“Recommended”** indicates revisions that would improve consistency with state laws, although they are not strictly required.
- **“Optional”** indicates revisions that represent ways in which the City could elect to amend its SMP in accordance with state laws, but that are not necessarily required or recommended for consistency with state laws.

This document attempts to minimize the use of abbreviations; however, a select few are used to keep the document concise. These abbreviations are compiled below in Table 1.

Table 1. Abbreviations used in this document.

Abbreviation	Meaning
City	City of Sequim
Ecology	Washington State Department of Ecology
FEMA	Federal Emergency Management Agency
RCW	Revised Code of Washington
SMP	Shoreline Master Program
WAC	Washington Administrative Code
SMC	Sequim Municipal Code

2. Consistency with Legislative Amendments

Table 2 summarizes mandatory and recommended revisions to the Sequim SMP based on the review of consistency with legislative amendments made since SMP adoption. In general, the potential changes to the SMP are minor in nature. The potential amendments address revised rules regarding SMP procedures, applicability, and administration. Note that section numbers may be updated during the revision process. The section numbers listed in the table below may differ from those in proposed updates to the SMP.

Table 2 summarizes potential revisions to the City’s SMP based on a review of consistency with amendments to state laws identified in the Periodic Review Checklist provided by Ecology. Topics are organized chronologically by year.

Summary of consistency with amendments to state laws and potential revisions.

Row	Summary of change	Review	Action
2019			
a.	Washington State Office of Financial Management (OFM) adjusted the cost threshold for building freshwater docks	Not applicable. There are no freshwater docks in Sequim.	No action necessary.
b.	The Legislature removed the requirement for a shoreline permit for disposal of dredged materials at Dredged Material Management Program sites	There are no Dredged Material Management Program sites on the City’s shoreline.	No action necessary.
c.	The Legislature added restoring native kelp, eelgrass beds and native oysters as fish habitat enhancement projects.	Section 7.2 (Exemptions from Substantial Development Permit Requirements) of the SMP references WAC 173-27-040 and includes a list of exemptions. It is not explicitly clear that the list of exemptions in WAC 173-27-040 applies, and that the list in the SMP is a duplication of this list. The list of exemptions in	No action necessary.

Row	Summary of change	Review	Action
		Section 7.2 references RCW 77.55 for fish habitat enhancement projects, and is therefore consistent with this legislative amendment.	
2017			
a.	OFM adjusted the cost threshold for substantial development to \$7,047.	The SMP (Chapter 3 and Sections 7.1, 7.2, and 7.3.1) references outdated cost threshold figures.	Mandatory: Update SMP to include updated cost thresholds and/or rely on reference to WAC 173-27-040 for exemptions, including threshold amounts.
b.	Ecology permit rules clarified the definition of “development” does not include dismantling or removing structures.	The SMP definition of “development” (Chapter 3) does not clarify that removing structures does not constitute development.	Recommended: Revise the definition of “development” consistent with Ecology’s recommended language to exclude dismantling or removing structures.
c.	Ecology adopted rules clarifying exceptions to local review under the SMA.	The SMP does not reference all of the statutory exceptions to local review under the SMA, though some of them are listed as exemptions within the SMP (Section 7.2).	Recommended: Revise SMP to include reference to all statutory exceptions to local review identified in WAC 173-27-044 and -045 and remove existing partial references to project types identified in WAC 173-27-044 and -045, which indicate that these are exempt from the permitting process but must still comply with SMA requirements, rather than properly identifying as exceptions to local review under the SMA.
d.	Ecology amended rules clarifying permit filing procedures consistent with a 2011 statute.	The SMP describes permit filing processes in SMP Chapter 7. SMP language is consistent with this provision, though certain procedures could be further clarified.	Recommended: Modify language for greater clarity and consistency with the updated procedures, including the use of return receipt requested mail for providing Ecology with permit application materials, and concurrent submittal and review of shoreline projects which require multiple shoreline permits (e.g. SSDP and CUP).
e.	Ecology amended forestry use regulations to clarify	Forest management practices are prohibited by the SMP (Table 6.1 and Section 6.3.1).	No action necessary.

<i>Row</i>	<i>Summary of change</i>	<i>Review</i>	<i>Action</i>
	that forest practices that only involves timber cutting are not SMA “developments” and do not require SDPs.	Sequim does not contain forest lands within shoreline jurisdiction.	
f.	Ecology clarified the SMA does not apply to lands under exclusive federal jurisdiction	The SMP does not address federal lands.	No action necessary.
g.	Ecology clarified “default” provisions for nonconforming uses and development .	Section 6.3.2 establishes the City’s provisions for nonconforming uses and developments in shoreline jurisdiction. This section also references the City-wide nonconforming provisions in SMC 18.64 (with exceptions). Chapter 3 of the SMP includes a single definition for “Nonconforming use or development.”	Recommended: Consider updating language for clarity, including updating the SMP to provide distinct definitions for nonconforming structures, uses, and lots.
h.	Ecology adopted rule amendments to clarify the scope and process for conducting periodic reviews .	The current SMP does not address the periodic review provision, nor is it required to. This is already included in RCW 90.58.080 and WAC 173-26-090.	No action necessary.
i.	Ecology adopted a new rule creating an optional SMP amendment process that allows for a shared local/state public comment period.	The SMP does not address the optional amendment process, nor is it required to. This is already included in WAC 173-26-104.	No action necessary.
j.	Submittal to Ecology of proposed SMP amendments.	The SMP does not address the SMP amendment process, nor is it required to. This is already included in WAC 173-26-110 and WAC 173-26-120.	No action necessary.
2016			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing	The SMP does not address the new ADA exemption.	Recommended: Update SMP (Section 7.2) to include a listed exemption for retrofitting structures to comply with the

<i>Row</i>	<i>Summary of change</i>	<i>Review</i>	<i>Action</i>
	structures to comply with the Americans with Disabilities Act (ADA) .		ADA and/or rely on reference to WAC 173-27-040 for exemptions.
b.	Ecology updated wetlands critical areas guidance including implementation guidance for the 2014 wetlands rating system.	The SMP adopts the City’s CAO by reference, and also includes a copy of the referenced CAO as Appendix A of the SMP. Both SMP Appendix A and the City’s current CAO (updated 2017), refer to the outdated wetland rating system (2004).	Recommended: Revise shoreline critical areas regulations to reference the 2014 wetland rating system. This could be accomplished by updating the CAO concurrently with the SMP or by updating SMP Appendix A directly and removing the reference to SMC 18.80. City may be able to defer taking this action until the update of City-wide critical areas provisions occurs during the next Growth Management Act Periodic Update. See discussion in Section 3.
2015			
a.	The Legislature adopted a 90-day target for local review of Washington State Department of Transportation (WSDOT) projects.	The SMP does not address this, as there are no state routes within shoreline jurisdiction in Sequim.	No action necessary.
2014			
a.	The Legislature created a new definition and policy for floating on-water residences legally established before 7/1/2014.	The SMP prohibits residential development over water. There are no existing floating on water residences in Sequim.	No action necessary.
2012			
a.	The Legislature amended the SMA to clarify SMP appeal procedures .	The current SMP does not address SMP update appeal procedures, nor is it required to. This is already addressed in RCW 90.58.190.	No action necessary
2011			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved federal wetland delineation manual .	Both SMP Appendix A and the City’s updated CAO (SMC 18.80.070.F.2) reference WAC 173-22-035 for wetland delineation procedures, and are therefore consistent with this provision.	No action necessary.

<i>Row</i>	<i>Summary of change</i>	<i>Review</i>	<i>Action</i>
b.	Ecology adopted rules for new commercial geoduck aquaculture .	The SMP is consistent with this provision. Commercial geoduck aquaculture requires a CUP, the definition of “aquaculture” clarifies that it does not apply to wild geoduck harvest, and the SMP’s aquaculture provisions and application procedures are otherwise consistent with this provision (Chapter 3 and Sections 6.3.3 and 7.3.4).	No changes needed.
c.	The Legislature created a new definition and policy for floating homes permitted or legally established prior to January 1, 2011.	The SMP prohibits residential development over water. There are no existing floating homes in Sequim.	No action necessary.
d.	The Legislature authorized a new option to classify existing residential structures as conforming .	The SMP (Section 6.2.3) classifies existing residential structures and appurtenant structures that were legally established and are used for a conforming use as conforming structures.	No action necessary.
2010			
a.	The Legislature adopted Growth Management Act – Shoreline Management Act clarifications .	The current SMP was adopted in 2013 and the City’s shoreline critical areas regulations (Appendix A) were updated in 2012. The City’s City-wide CAO was last updated in 2017. The SMP includes no net loss provisions. The SMP does not address SMP amendment procedures, nor does it clarify that SMP amendments are effective 14 days from Ecology’s written notice of final action.	Mandatory: Update SMP to include reference to the City’s current CAO. See discussion in Section 3 below for details. Recommended: Revise the SMP to clarify that SMP amendments are effective 14 days from Ecology’s written notice of final action.

Row	Summary of change	Review	Action
2009			
a.	The Legislature created new “relief” procedures for instances in which a shoreline restoration project within a UGA creates a shift in Ordinary High Water Mark.	The SMP does not address this, and is not required to.	No action necessary.
b.	Ecology adopted a rule for certifying wetland mitigation banks .	Both SMP Appendix A and the City’s current CAO (SMC 18.80) authorize the use of certified mitigation banks.	No action necessary.
c.	The Legislature added moratoria authority and procedures to the SMA.	The SMP does not address moratoria authority, and is not required to.	No action necessary.
2007			
a.	The Legislature clarified options for defining “ floodway ” as either the area that has been established in FEMA maps, or the floodway criteria set in the SMA.	The term “floodway” is not defined in Chapter 3 of the SMP, Definitions, and the SMP only uses the term sparingly in other definitions (“Shorelands” and “Appurtenant Structures”).	No action necessary.
b.	Ecology amended rules to clarify that comprehensively updated SMPs shall include a list and map of streams and lakes that are in shoreline jurisdiction.	No new shoreline waterbodies have been identified since the comprehensive update. The areas of shoreline jurisdiction are listed in the SMP.	No action necessary.
c.	Ecology’s rule listing statutory exemptions from the requirement for an SDP was amended to include fish habitat enhancement projects that conform to the	SMP Section 7.2 lists fish habitat enhancement projects as exempt from the requirement for an SDP.	No action necessary.

<i>Row</i>	<i>Summary of change</i>	<i>Review</i>	<i>Action</i>
	provisions of RCW 77.55.181.		

3. Consistency with Critical Areas Ordinance

The SMP regulates critical areas in shoreline jurisdiction through the adoption by reference of Chapter 18.80 of the SMC, the City’s Critical Areas Ordinance (CAO), as adopted and revised on November 13, 2012 through Ordinance 2011-028. This version of the CAO applies only within shoreline jurisdiction, as the City-wide CAO in SMC 18.80 has since been updated with minor revisions, most recently in 2017 (Ordinance 2017-005). However, the length of time since the last comprehensive update of the CAO has resulted in some regulations which are out-of-date and inconsistent with the SMA and best available science (BAS). These include regulations related to wetland and stream classification and buffers.

Table 3 below summarizes issues to be resolved in order to integrate the City’s current CAO into the updated SMP. The table is organized by critical areas regulations subject area.

Issues to be resolved to integrate the City’s CAO into the updated SMP.

#	Issue	Review	Action
Wetlands			
1	Wetland Rating System	See row 2016.b in Table 2, above.	See row 2016.b in Table 2, above.
2	Wetland Buffers	Wetland buffers in SMP Appendix A and SMC 18.80 are based on wetland category, according to the 2004 wetland rating system, and land use intensity. Ecology provided updated buffer guidance in July 2018, which provides jurisdictions a number of options for wetland buffers. Current buffer width provisions are out-of-date with respect to BAS, current Ecology guidance, and the 2014 wetland rating system.	Recommended: Update wetland buffer table, based on 2018 Ecology guidance. See Table 4 below for a side-by-side breakdown of current versus proposed buffer widths. City may be able to defer taking this action until the update of City-wide critical areas provisions to occur during the next Growth Management Act Periodic Update.
Streams			
3	Updated Water Typing System	SMP Appendix A and SMC 18.80 both establish a stream classification system to rate streams from Type 1 to Type 5.	Recommended: Update shoreline critical areas regulations to reflect updated water typing system as defined in WAC 222-16-030. City may be able to defer

#	Issue	Review	Action
			taking this action until the update of City-wide critical areas provisions to occur during the next Growth Management Act Periodic Update.
4	Stream Buffers	The stream buffers currently established in SMP Appendix A and SMC 18.80 are outdated with regard to BAS. Current buffer provisions can be found in Table 5 below, alongside a range of sample buffer widths based on BAS and provisions from other jurisdictions.	Recommended: Update stream buffer provisions current best available science. A wide range of stream buffer widths are recommended by BAS, depending on the target functions and buffer condition. A range of buffer widths based on BAS and the provisions in place in other jurisdictions is shown in Table 5. City may be able to defer taking this action until the update of City-wide critical areas provisions to occur during the next Growth Management Act Periodic Update.

Wetlands

In July 2018, Ecology updated its guidance for wetland buffers. The change in guidance is the result of Ecology’s continued evaluation of the 2014 wetland rating system as it relates to the 2004 wetland rating system. Ecology’s intent was that the change from the 2004 to 2014 rating system would not significantly affect resulting buffers. The wetland buffers referenced in SMP Appendix A and in SMC 18.80 are consistent with each other, but both are outdated related to the best available science and Ecology’s most recent guidance. To align the SMP buffers with the updated Ecology guidance, we recommend updating the Shoreline Critical Areas Regulations in SMP Appendix A to reference the 2014 wetland rating system and to follow Ecology’s new guidance for wetland buffer widths. In the updated guidance, Ecology provides a number of alternative approaches to wetland buffer tables, which include an option to provide buffer widths based on adjacent land use intensity, similar to the City’s current approach. Table 4 below highlights the comparison between the City’s current wetland buffer widths and those provided by Ecology’s current guidance.

Wetland buffer provisions under SMC 18.80/SMP Appendix A and Ecology’s 2018 Guidance.

Table 4.

Category	SMP Appendix A & SMC 18.80		Proposed Per 2018 Ecology Guidance		
	Land Use Intensity		Land Use Intensity		
	Low	High	Low	Moderate	High
1	125-150	200	150	225	300
2	65-100	100-150	150	225	300
3	40-75	75-125	75	110	150
4	25		25	40	50

Streams

SMP Appendix A and SMC 18.80 both establish a water typing system that classifies streams from Type 1 to Type 5. This classification system and criteria are inconsistent with current BAS, and we recommend that the City adopt the Washington State Department of Natural Resources (WDNR) Forest Practices water typing system, as established in WAC 222-16-030. The WDNR system is widely accepted across most jurisdictions in Washington.

A wide range of stream buffer widths are recommended by BAS, depending on the target functions and buffer conditions. Buffer continuity and vegetative quality are important factors in determining buffer widths. Current stream buffer requirements under SMP Appendix A and SMC 18.80 are consistently below the ranges recommended by BAS. Based on the functions that different widths of buffers provide, fish bearing stream buffers should be a minimum of 100 feet, although buffer averaging may be allowed to reduce these buffers to as low as 75 feet.

Table 5 below provides a comparison of current water typing and buffer widths alongside the proposed WDNR water typing system and a summary of buffer width ranges derived from BAS and other local jurisdictions.

Stream buffer provisions under SMC 18.80/SMP Appendix A and BAS, including an updated water typing system.

Table 5.

SMP Appendix A & SMC 18.80		Sample Buffer Ranges	
Stream Type	Buffer Width	Stream Type	Buffer Width
1 (Shorelines)	150	Type S	115-165
2/3 (Salmon bearing)	100 / 75	Type F	100-165
4 (Non-salmon fish bearing)	25	Type F	100-165
5 (Non-fish bearing)	25	Type Np/Ns	50-65

4. Consistency with the Comprehensive Plan & Other Development Regulations/Codes

The City of Sequim Comprehensive Plan does not include a distinct Shoreline Element, nor does it reference the SMP. Similarly, while the SMP references the need for shoreline development proposals to be consistent with the City's Comprehensive Plan, it does not clearly establish that the goals and policies of the SMP are considered part of the City's Comprehensive Plan. Though SMP goals and policies act as an element of the Comprehensive Plan regardless of whether it is established in these documents, both the SMP and the Comprehensive Plan could benefit from a more clearly defined relationship between the two, which could be accomplished with minor cross-reference revisions.

The City's Zoning Code (Title 18 SMC) establishes that zoning regulations shall be subordinate to SMP regulations, except where zoning code regulations are more stringent than those found in the SMP. The City's Land Use and Development Code (Title 20 SMC) establishes permit and appeal procedures which are referenced within the SMP. No revisions to the SMP or SMC are necessary to ensure consistency between the two sets of regulations.

5. Staff Recommendations & Other Issues to Consider

City of Sequim Community Planning and Development staff have also highlighted for consideration certain modifications to the SMP. Proposed changes are primarily to improve clarity and functionality of the document, as well as to provide additional flexibility to applicants in areas functionally disconnected from the shoreline. A selection of the proposed changes, rationale, and input from The Watershed Company are included in Table 6 below.

Additional issues identified by City staff.

#	Issue	Review & Relevant Location(s)	Action
1	Isolated Areas / Functional Disconnect	Review: City planning staff have noted that there is a lack of clarity on the applicability of certain shoreline regulations when a project is disconnected from the shoreline by substantial infrastructure, such as a public roadway. This is particularly relevant in Sequim, as much of the City’s shoreline jurisdiction lies landward of substantial infrastructure (e.g., W Sequim Bay Rd). Many SMPs include language which clarify that certain regulations, such as shoreline buffers, do not apply in these instances, which would provide additional flexibility for applicants landward of these functional disconnects.	Recommended: Consider adding SMP language to establish that certain shoreline regulations, including buffers, do not apply in the case of a functional disconnect from the shoreline by a public roadway or other substantial infrastructure.
2	Public Ownership of Marina Facilities	Review: The City recently issued an administrative interpretation (2018) to clarify the SMP’s prohibition of private marina facilities within the City’s shoreline jurisdiction. While the Shoreline Uses/Activities Matrix (Table 6.1) clearly prohibits private marina facilities, there is	Recommended: Consider revising Section 6.3.6 to remove language referencing “private marina facilities” in Regulation 3 and clarifying that the regulation is referring to new <i>public</i> marina facilities. As established in Table 6.1, new and expanded <i>public</i> marina facilities would also require a

#	Issue	Review & Relevant Location(s)	Action
		<p>language referencing the expansion of “private marina facilities” in Section 6.3.6, which has introduced some amount of confusion. While, as described in the City’s administrative interpretation, the intent of this language was to capture the potential for expansion of the City’s shoreline jurisdiction, and the potential incorporation of existing private marina facilities through this expansion, the language could be clarified.</p> <p>Relevant Locations:</p> <ul style="list-style-type: none"> • Table 1 • Section 6.3.6, Regulation 3 	<p>CUP. Therefore, this clarification would allow this regulation to more clearly apply to both public and private marina expansions. Additionally, consider adding regulatory text clearly establishing that new private marina facilities are prohibited. Potential language revisions are included below, for clarity:</p> <p><i>3. New <u>public</u> marina development or expansion of existing private marina facilities shall be allowed only in the Urban and associated Aquatic shoreline environments through a Shoreline Conditional Use Permit. <u>New private marina development is prohibited.</u></i></p>
3	Research District/PNNL Property Provisions	<p>Review: The PNNL Marine Research Laboratory property is located north of City limits, but is within Sequim’s Urban Growth Area. City staff have noted an interest in using this periodic review process to evaluate the SMP to ensure that, in the event this area is annexed by the City, the SMP will not impose overly cumbersome restrictions on continued use of this facility. The SMP establishes a “Research District” shoreline environment designation (SED) for this area. The policies for this SED establish that “development...should be subject to increased environmental review.” Additionally, the regulations</p>	<p>Optional: Consider revising the policies in Chapter 5 and the regulations in Section 6.3.5 to ensure that these provisions align with the City’s vision for the potential inclusion of the PNNL property within Sequim’s city limits and shoreline jurisdiction.</p>

#	Issue	Review & Relevant Location(s)	Action
		<p>for research and development facilities (Section 6.3.5) establish that proposals may require an Environmental Impact Statement if they result in a 30% or greater increase in impervious surface area, and also restrict horizontal expansion of facilities unless it is demonstrated that vertical expansion is infeasible.</p> <p>Relevant Locations:</p> <ul style="list-style-type: none"> • Chapter 5 • Section 6.3.5 	

6. References

Ecology (Washington State Department of Ecology). September 2019. Revised Periodic Review Checklist Guidance. Shoreline Master Program Periodic Review. Accessed December 2019.

https://fortress.wa.gov/ecy/ezshare/sea/ShorelinePlannerToolbox/2019/PeriodicReviewChecklist_Guidance_9-19_rev.pdf

Ecology (Washington State Department of Ecology). July 2018. July 2018 Modifications for Habitat Score Ranges. Modified from Wetland Guidance for CAO Updates: Western Washington Version. Ecology Publication No. 16-06-001. Accessed November 2018.

<https://fortress.wa.gov/ecy/publications/parts/1606001part1.pdf>

Hruby, T. 2014. Washington State Wetland Rating System for Western Washington: 2014 Update. Ecology Publication No. 14-06-029. Washington State Department of Ecology, Olympia, WA.

Sequim (City of Sequim). City of Sequim Shoreline Master Program. November 2013. City of Sequim, WA. Accessed October 2020.

<https://www.codepublishing.com/WA/Sequim/html/pdfs/SMP.pdf>

Sequim (City of Sequim). 2018. City of Sequim Comprehensive Plan 2015-2035. City of Sequim, WA. Accessed October 2020. <https://www.sequimwa.gov/259/Comprehensive-Plan-2015-2035>