

# Shoreline Master Program Periodic Review

## City of Battle Ground

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# 1. Introduction

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This document presents the result of the City of Battle Ground (City) Shoreline Master Program regulatory and policy gap analysis. In accordance with the Washington State Shoreline Management Act, local jurisdictions with “Shorelines of the State” are required to conduct a periodic review of their Shoreline Master Programs (SMPs) (Washington Administrative Code [WAC] 173-26-090). The periodic review is intended to keep SMPs current with amendments to state law, changes to local plans and regulations, changes in local circumstances, and new or improved data and information. The review is intended to be limited in scope in comparison with the City’s 2012 Comprehensive SMP update, with an emphasis on required legislative changes.

The City adopted its current SMP, effective December 24, 2012 (Ordinance No. 12-11). Salmon and Morgan Creek are the only shorelines of the State in City limits and the City Urban Growth Area.

The current SMP outlines goals and policies for the shorelines of the City and establishes regulations for development occurring within shoreline jurisdiction. A reference to the City’s SMP is codified as Chapter 18.320 of the Battle Ground Municipal Code (BGMC). The current SMP regulates critical areas in shoreline jurisdiction through a reference to the city-wide critical areas regulations in BGMC 18.260, 18.270, 18.280, 18.300, and 18.310, as adopted on December 6, 2004 (Ordinance 04-025) and July 16, 2012 (Ordinance 12-06). Elsewhere throughout the City, critical areas are regulated by the City’s updated Critical Areas Ordinance, which has been updated since the adoption of the current SMP, most recently in 2019 (Ordinance 19-24).

As a first step in the periodic review process, the City’s current SMP was reviewed by City staff and consultants. The purpose of this Gap Analysis Report is to provide a summary of the review and inform updates to the SMP. This report is organized into the following sections:

- **Section 2** identifies gaps in consistency with state laws. This analysis is based on a list of amendments between 2007 and 2019 as summarized by the Washington State Department of Ecology (Ecology) in its Periodic Review Checklist.
- **Section 3** identifies issues with integrating the City’s current critical areas regulations into the updated SMP.
- **Section 4** identifies gaps in consistency and implementation between the updated SMP and the City’s Comprehensive Plan and Municipal Code.

- **Section 5** identifies other issues that could be addressed to produce a more effective SMP.

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 but are not strictly required by legislation.
- **“Optional”** indicates legislative amendments that can be adopted at the City’s preference but are not required.
- **“No action necessary”** indicates the current SMP meets the intent of or already contains listed legislative updates, changes to critical areas, comprehensive plan or zoning code.

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
BAS	Best Available Science
BGMC	Battle Ground Municipal Code
CAO	Critical Areas Ordinance
City	City of Battle Ground
Ecology	Washington State Department of Ecology
RCW	Revised Code of Washington
SMA	Shoreline Management Act
SMP	Shoreline Master Program
SSDP	Shoreline Substantial Development Permit
WAC	Washington Administrative Code

## 2. Consistency with Legislative Amendments

Table 2 summarizes mandatory, recommended, and optional revisions to the Battle Ground SMP based on the review of consistency with legislative amendments made since SMP adoption. In general, mandatory changes to the SMP are minor in nature. These amendments address revised rules regarding SMP applicability, including updated exemption thresholds and definitions. Ecology has also developed new guidance on regulating nonconforming uses, structures, and development that may be useful for the City to clarifying the nonconformance regulations in its SMP (Item 2017g below). 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. Topics are organized chronologically by year.

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

Row	Summary of change	Review	Action
<b>2019</b>			
a.	Washington State Office of Financial Management (OFM) adjusted the <b>cost threshold for building freshwater docks</b>	SMP Section 2.3.2.1 includes an outdated cost threshold.	<b>Mandatory:</b> The City will update the cost threshold dollar figure for when an SSDP is triggered through a reference to WAC 173-27-040. This enables the cost threshold to update automatically in the future.
b.	The Legislature removed the requirement for a shoreline permit for disposal of dredged materials at Dredged Material Management Program (DMMP) sites	There are no DMMP sites on the shoreline. Therefore, this legislative amendment does not apply.	No action necessary
c.	The Legislature added restoring native kelp, eelgrass beds and native oysters as fish habitat enhancement projects.	There are no saltwater shorelines in City limits or UGA's. Therefore, this legislative amendment doesn't apply	No action necessary
<b>2017</b>			
a.	OFM adjusted the <b>cost threshold for substantial development</b> to \$7,047.	SMP Section 2.3.2 List of Exemptions, references the out of date dollar figure, section 2.3.2.1, as well as the out of date RCW reference.	<b>Mandatory:</b> Cost threshold resolved in recommended action 2019.a

Row	Summary of change	Review	Action
b.	Ecology permit rules clarified the <b>definition of “development”</b> does not include dismantling or removing structures.	The current SMP definition for development under SMP Section 8.45 does not include the amended rule	<p><b>Recommended:</b>            The City will consider adding the following Ecology recommended language to the ‘Development’ definition (<u>in underline</u>):</p> <p><i>“an activity consisting of the construction or exterior alteration of structures; dredging; drilling; dumping; filling; removal of any sand, gravel, or minerals; bulkheading; driving of piling; placing of obstructions; or any project of a permanent or temporary nature that may interfere with the normal public use of the surface of the waters overlying lands subject to the Shorelines Management Act of 1971 at any state of water level (RCW 90.58.030(3d)). <u>“Development” does not include dismantling or removing structures if there is no other associated development or re-development, as amended by RCW 90.58.030(3d).</u>”</i></p>
c.	Ecology adopted rules clarifying <b>exceptions to local review under the SMA.</b>	<p>SMP Section 2.2 Shoreline Substantial Development Permit Required lists the exceptions to local review, but does not provide a direct reference to WAC 173-27-044, and -045.</p> <p>Further, exceptions #12 and #17 (original numbering) listed under Section 2.3(2), List of Exemptions, are already included within Section 2.2(4)(a).</p>	<p><b>Recommended:</b>            The City will consider including exceptions to local review under the SMA as a direct reference to WAC 173-27-044, and -045, as amended, including listing the exceptions.</p> <p>Section 2.2, Shoreline Substantial Development Required, is a suitable place to include these WAC references, with emphasis that exceptions are not to be confused with Exemptions from a Shoreline Substantial Development Permit, described under Section 2.3.</p> <p>Finally, duplicate provisions will be removed under Section 2.3.2 (#12 and #17) will be removed from this section.</p>
d.	Ecology amended rules clarifying <b>permit filing</b>	SMP does not clarify or describe rules for the permit filing process. The SMP was	<p><b>Recommended:</b>            Modify language for consistency with Ecology’s recommended language.</p>

Row	Summary of change	Review	Action
	<b>procedures</b> consistent with a 2011 statute.	updated in 2012. This legislative update seems to have been briefly captured in section 7.4. Further, date of filing is also defined under Chapter 8 but is not consistent with RCW 90.58.140(6)	The City will consider updating SMP Chapters 7.4 and 8 (specifically item #44, Date of filing definition), to describe that all shoreline permits adhere to the date of filing with Ecology, pursuant to WAC 173-27-130.
e.	Ecology amended forestry use regulations to clarify that forest practices that only involves timber cutting are not SMA “developments” and do not require SDPs.	SMP section 6.3(5) Forestry Practices prohibits forestry practices within SMP jurisdiction. Therefore, this amendment does not apply.	No action necessary
f.	Ecology clarified the SMA does not apply to lands under <b>exclusive federal jurisdiction</b>	There are no federal lands within Battle Ground SMP jurisdiction.	No action necessary
g.	Ecology clarified “default” provisions for <b>nonconforming uses and development</b> .	SMP Section 2.5 and Chapter 8 provides definitions for “nonconforming structures” and “nonconforming use”, as well as Section 2.5(4) for “nonconforming lots”. “Nonconforming lots” is not a listed definition, however.	<b>Recommended:</b> The city should consider adding language to include the definition for nonconforming lot to Chapter 8, Definitions.
h.	Ecology adopted rule amendments to clarify the scope and process for conducting <b>periodic reviews</b> .	SMP does not include procedure for periodic reviews. SMP 7.2.2.1(b) references RCW for periodic review, however.	No action necessary
i.	Ecology adopted a new rule creating an <b>optional SMP amendment process</b> that allows for a shared local/state public comment period.	The SMP loosely references amendments to the SMP under SMP 7.2.2.1(a) and 7.2.3(4), but does not include a reference to WAC 173-26-090 which addresses both locally initiated and periodic review amendments of SMPs and WAC 173-26-104, which outlines the SMP amendment adoption process.	<b>Optional:</b> Amend the Amendments to the Shoreline Master Program (SMP 7.2.2.1(a)) to reference the optional joint review process.

Row	Summary of change	Review	Action
j.	<b>Submittal</b> to Ecology of proposed SMP amendments.	This is optional and the SMP does not currently address the amendment process amendment routing requirements pursuant to the requirements of WAC 173-26.	No action necessary
<b>2016</b>			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing structures to comply with the <b>Americans with Disabilities Act (ADA)</b> .	The SMP does not address new shoreline permit exemption for existing structures to comply with ADA.	<p><b>Recommended:</b>            The City may consider adding new exemption language to SMP, using Ecology’s recommended language:  <u>‘The external or internal retrofitting of an existing structure with the exclusive purpose of compliance with the American with Disabilities Act of 1990 or to otherwise provide physical access to the structure by individuals with disabilities.’</u></p> <p>This amendment can also be captured through a direct reference to WAC 173-27-040, under Section 2.3.2, List of Exemptions</p>
b.	Ecology updated <b>wetlands critical areas guidance</b> including implementation guidance for the 2014 wetlands rating system.	The Battle Ground Critical Areas Regulations listed under Appendix B do not contain this rating system.	<p><b>Recommended:</b>            The City may adopt by reference the most-recent Critical Areas Ordinance, to capture the 2014 Wetland Rating System. See Section 3 of this Gap Analysis for additional information and approach.</p>
<b>2015</b>			
a.	The Legislature adopted a <b>90-day target</b> for local review of Washington State Department of Transportation (WSDOT) projects.	The SMP does not address this.	<p><b>Optional:</b>            Consider amending SMP to define special procedures for WSDOT projects per WAC 173-27-125, specifically within SMP Chapter 7, Administration and Enforcement, Section 7.1, General Provisions.</p>
<b>2014</b>			
a.	The Legislature created a new definition and policy for <b>floating on-water residences</b>	The SMP defines Floating on-water residences in Section 8.72 and Section 6.3.11.3. No	No action necessary

Row	Summary of change	Review	Action
	legally established before 7/1/2014.	floating on-water residences exist, however.	
<b>City of Battle Ground Shoreline Master Program, Ord. No. 12-01, Amended Res. 12-11, effective December 24, 2012</b>			
<b>2012</b>			
a.	The Legislature amended the SMA to clarify <b>SMP appeal procedures</b> .	The current SMP does not address appeal procedures for the SMP itself. This procedure is already outlined in the WAC.	No action necessary
<b>2011</b>			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved <b>federal wetland delineation manual</b> .	The Battle Ground Critical Areas Regulations listed under Appendix B do not contain the federal wetland delineation manual.	<b>Recommended:</b> The City may adopt by reference the most-recent Critical Areas Ordinance, to capture the approved federal wetland delineation manual.
b.	Ecology adopted rules for new commercial <b>geoduck aquaculture</b> .	City contains freshwater shoreline only, this rule is not applicable.	No action necessary
c.	The Legislature created a new definition and policy for <b>floating homes</b> permitted or legally established prior to January 1, 2011.	The SMP already defines Floating on-water residences in Section 8.72 and Section 6.3.11.3.	No action necessary
d.	The Legislature authorized a new option to classify existing residential structures as conforming.	The SMP does not classify existing non-conforming residential structures as conforming.	<b>Optional:</b> The City may consider whether to exercise the option to clearly classify existing legally established residential structures as conforming under Section 2.5.3.2(h), even if they do not meet dimensional standards for setbacks, buffers, height, density, etc. Appurtenant structures are included, but bulkheads and other shoreline modifications and over-water structures are excluded.
<b>2010</b>			
a.	The Legislature adopted <b>Growth Management Act – Shoreline</b>	SMP section 1.8., Effective Date, exists, detailing amendments to SMP regulations go into effect 14 days from Ecology’s written	No action necessary

Row	Summary of change	Review	Action
	<b>Management Act clarifications.</b>	notice of final action. In addition, BGMC 18.320.070 details amendments to the SMP need to be consistent with WAC 173-26.	
<b>2009</b>			
a.	The Legislature created new “relief” procedures for instances in which a <b>shoreline restoration project within a UGA</b> creates a shift in Ordinary High Water Mark.	The SMP addresses such relief procedures in Section 5.1.12.a	No action necessary
b.	Ecology adopted a rule for certifying <b>wetland mitigation banks</b> .	Battle Ground already authorizes certified mitigation banks BGMC 18.270.120. Not found in SMP.	<b>Recommended:</b> The City adopt by reference the most-recent Critical Areas Ordinance to capture this rule.
c.	The Legislature added <b>moratoria authority/</b> procedures to the SMA.	The SMP does not address moratoria authority. This procedure is already outlined in the WAC.	<b>Recommended:</b> Add moratoria authority procedures to provide the City with future flexibility. This can be introduced under Chapter 2, Applicability, Shoreline Permits, and Exemptions
<b>2007</b>			
a.	The Legislature clarified options for defining <b>"floodway"</b> as either the area that has been established in FEMA maps, or the floodway criteria set in the SMA.	Floodway is defined in SMP Section 8.76 and includes discussion for the elected use of FEMA maps to define floodways in the city.	No action necessary
b.	Ecology amended rules to clarify that comprehensively updated SMPs shall include a <b>list and map of streams and lakes</b> that are in shoreline jurisdiction.	No new shoreline waterbodies identified since 2012 SMP update. However, the SMP is not explicit on shorelines located in City.	<b>Mandatory:</b> The City will list rivers in Section 2.1, Applicability.  For better readability, the shoreline jurisdiction locations established under Section 4.4, Official Shoreline Map should

Row	Summary of change	Review	Action
			<p>be removed since it will already be listed under Section 2.1.</p> <p>The creeks in shoreline jurisdiction are more properly listed in Section 2.1 Applicability to describe the extent of shoreline jurisdiction.</p> <p>In addition, areas within the UGA remain under the County SMP until annexation – this is described in Section 2.1.1.</p>
c.	<p>Ecology’s rule listing statutory exemptions from the requirement for an SSDP was amended to include <b>fish habitat enhancement projects</b> that conform to the provisions of RCW 77.55.181.</p>	<p>SMP Section 6.4.5.7 lists a fish habitat enhancement exemption.</p>	<p><b>Recommended:</b> In addition to Section 6.4.5.7, this exemption can also be captured under a direct reference to WAC 173-27-040, listing developments not required to get a SSDP.</p>

### 3. Consistency with Critical Areas Ordinance

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The City’s SMP alone provides protection for critical areas within shoreline jurisdiction. The current SMP regulates critical areas in shoreline jurisdiction through a series of references to critical areas regulations contained in BGMC Chapters 18.260, 18.270, 18.280, 18.300 and 18.310, as adopted on December 6, 2004 (Ordinance 04-025) and July 16, 2012 (Ordinance 12-06). These regulations are reproduced as Appendix B of the SMP. Elsewhere throughout the City, critical areas are regulated by the City’s current Critical Areas Ordinance (CAO) as codified in BGMC 18.260 through .310, which have been updated since the adoption of the current SMP, most recently in 2019 (Ordinance 19-24). The SMP does not include the City’s regulations for critical aquifer recharge areas (CARAs) contained in BGMC Chapter 18.290, as there are no CARAs within shoreline jurisdiction in Battle Ground.

It is expected that the City will update the adoption by reference during this periodic update, such that the City’s most current critical areas regulations will apply within shoreline jurisdiction. As such, this gap analysis report covers a review of the City’s most current critical areas regulations, and identifies any amendments recommended or required prior to incorporation into the updated SMP. Recommendations provided in this report primarily relate

to clarifying the applicability of the CAO within shoreline jurisdiction and mechanisms for wetland buffer variation.

Table 3 below summarizes issues to be resolved in order to incorporate the City’s current CAO into the updated SMP.

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

#	Issue	Review & Relevant Location(s)	Action
<b>General</b>			
Table 3. 1	Incorporating Critical Areas Regulations by Reference	<p><b>Review:</b>            The SMP currently adopts critical areas regulations from BGMC Title 18, as adopted in 2004 and 2012, by reference. References within the SMP must be for specific, dated versions of critical areas regulations. As such, this reference should be updated to reference the current CAO.</p> <p>The SMP also includes exceptions to this adoption by reference, for portions of the CAO which are inconsistent with the SMA and therefore do not apply within shoreline jurisdiction. However, some of the exceptions are not as clearly established as they otherwise could be for the benefit of both applicants and City staff.</p> <p><b>Relevant Location(s):</b></p> <ul style="list-style-type: none"> <li>• SMP Section 5.3.2</li> <li>• BGMC Title 18</li> </ul>	<p><b>Mandatory:</b> In the updated SMP, reference the most recently dated Critical Areas Ordinance. Consider revising language to more clearly denote sections of the CAO which shall not apply in shoreline jurisdiction.</p>
2	Definitions	<p><b>Review:</b>            The relationship between the definitions in the citywide critical areas regulations and the SMP could be made more explicit, as there are some inconsistencies between definitions. The following</p>	<p><b>Recommended:</b> Consider syncing the definitions in the SMP and the citywide critical areas regulations for greater clarity and consistency between the two sets of regulations.</p>

#	Issue	Review & Relevant Location(s)	Action
		<p>definitions are inconsistent between the two sets of regulations:</p> <ul style="list-style-type: none"> <li>• Best Management Practices</li> <li>• Buffer (Area)</li> <li>• Critical Aquifer Recharge Area</li> <li>• Development</li> <li>• Enhancement</li> <li>• Floodway</li> <li>• Hazardous Material</li> <li>• (Compensatory) Mitigation</li> <li>• Priority Habitats and Species</li> </ul> <p>The differences in definitions are predominantly minor, and not expected to be consequential, but greater consistency could improve clarity.</p> <p><b>Relevant Location(s):</b></p> <ul style="list-style-type: none"> <li>• <i>SMP Chapter 8</i></li> <li>• <i>BGMC 18.260.210</i></li> </ul>	<p>Alternatively, to improve clarity without altering definitions, introduce SMP Chapter 8 with text to clarify that in the event of a conflict in definitions, the definitions provided in the SMP shall apply.</p>
<b>Wetlands</b>			
3	Base Wetland Buffers Widths	<p><b>Review:</b></p> <p>BGMC 18.270.090(A) includes “base” wetland buffer widths. However, subsection (B) includes a comprehensive wetland buffer system, which establishes wetland buffers based on wetland rating, habitat score, and adjacent land use intensity. The buffer system provided in subsection (B) is consistent with Ecology’s most recent guidance and BAS. As such, the inclusion of “base” buffer widths in subsection (A) introduces some confusion, as it is unclear when and how the “base” buffer widths apply.</p> <p><b>Relevant Location(s):</b></p> <ul style="list-style-type: none"> <li>• <i>BGMC 18.270.090(A) and (B)</i></li> </ul>	<p><b>Recommended:</b> To improve clarity, remove “base” buffer width provisions in BGMC 18.270.090(A) and rely solely on the comprehensive buffer system provided in subsection (B).</p>

#	Issue	Review & Relevant Location(s)	Action
4	Isolated and Exempt Wetlands	<p><b>Review:</b>            The SMP states that wetlands considered “isolated and exempt” by the CAO <i>may</i> not qualify as such under the SMP (SMP regulation 5.3.2.12). BGMC 18.270.020 provides the CAO criteria for isolated and exempt wetlands. This code section clearly states that in order to qualify as isolated and exempt, the wetland may not be located within shoreline jurisdiction. As such, the SMP language could be much clearer with regards to the inapplicability of BGMC 18.270.020.</p> <p><b>Relevant Location(s):</b></p> <ul style="list-style-type: none"> <li>• BGMC 18.270.020</li> <li>• SMP Section 5.3.2, Regulation 12</li> </ul>	<p><b>Recommended:</b> Revise SMP Regulation 5.3.2.12 to clearly establish that the provisions for isolated and exempt wetlands in BGMC 18.270.020 shall not apply within shoreline jurisdiction.</p>
5	Wetland Buffer Variation	<p><b>Review:</b>            BGMC 18.270.090(C) includes options for potential reductions in wetland buffer width, based on the habitat score of the wetland. Subsection (C)(2) includes an allowance to utilize the buffers for moderate land use intensity if applicable minimization measures are implemented, though this allowance is limited to wetlands with a habitat score of 3-4. Ecology’s current guidance allows for this provision to be applied to wetlands with habitat scores up to 5, which would allow this buffer reduction option to apply more broadly.</p> <p><b>Relevant Location(s):</b></p>	<p><b>Recommended:</b> Revise BGMC 18.270.090(C)(2) to allow for buffer reduction mechanisms to apply to wetlands with habitat scores up to 5.</p>

#	Issue	Review & Relevant Location(s)	Action
6	Functional Disconnect Option for Wetland Buffer Flexibility	<p data-bbox="630 243 935 275">• <i>BGMC 18.270.090(C)(2)</i></p> <p data-bbox="630 289 1040 821"><b>Review:</b> Ecology’s current guidelines allow for an option to reduce wetland buffer widths when a legally established, non-conforming use of the buffer, such as a road or other substantial infrastructure, functionally disconnects the upland portion of the buffer. This option could be added to the CAO to provide applicants more flexibility with regards to wetland buffers while avoiding increased impacts to wetlands and buffers.</p> <p data-bbox="630 873 889 905"><b>Relevant Location(s):</b></p> <p data-bbox="630 915 935 947">• <i>BGMC 18.270.090(C)(2)</i></p>	<p data-bbox="1073 289 1419 548"><b>Optional:</b> Consider adding language to the CAO to allow reductions in wetland buffer widths where existing roads or structures lie within the buffer, in accordance with Ecology guidance.</p>

## 4. Consistency with Comprehensive Plan and Development Regulations.

Battle Ground’s Comprehensive Plan does not include a dedicated Shoreline Element, though references to the SMP are included in both the Introduction and Environment Element of the Comprehensive Plan. Shoreline goals and policies are included within the SMP itself. While the Comprehensive Plan establishes that the SMP is “considered an integral part of this Plan,” it does not clearly establish that the goals and policies of the SMP shall be considered an element of the Plan in accordance with RCW 36.70A.480. While the SMP clearly establishes the authority of the shoreline goals and policies as an element of the Comprehensive Plan, future amendments of the Comprehensive Plan could include a clearer incorporation of shoreline goals and policies.

BGMC Chapter 18.320 includes shoreline management regulations, though these regulations are provided via reference to the SMP document itself. BGMC 18.320.020 includes a reference to the current SMP. While this reference should be updated in accordance with the adoption of the updated SMP, only minor revisions to the SMP or development regulations are identified at this time, as identified in Table 4 below.

Table 4. Summary of consistency with City development regulations

#	Issue	Review & Relevant Location(s)	Action
1	Variance Permit Procedure	<p><b>Review:</b>            The City’s zoning code requires a Type III variance when the variance request involves or impacts property within the city’s shoreline jurisdiction, as per the city’s adopted shoreline master plan. This Type III process is set forth in Chapter 17.200 BGMC as well as the city’s adopted shoreline master plan.</p> <p><b>Relevant Location(s):</b></p> <ul style="list-style-type: none"> <li>• BGMC 17.149.020</li> <li>• BGMC 17.200</li> <li>• SMP Section 2.6</li> </ul>	<p><b>Recommended:</b> Review the SMP and BGMC 17.200 for overall consistency in the shoreline variance process. To better inform the applicant, add a note referencing the City review process, consistent with procedures outlined within BCMC 17.149.020.</p>
2	BGMC Reference to SMP	<p><b>Review:</b></p>	<p><b>Recommended:</b> This provision should be updated</p>

#	Issue	Review & Relevant Location(s)	Action
		<p>BGMC Chapter 18.320 includes shoreline management regulations, though these regulations are provided via reference to the SMP document itself. BGMC 18.320.020 includes a reference to the current SMP.</p> <p><b><u>Relevant Location(s):</u></b></p> <ul style="list-style-type: none"> <li>• <i>BGMC 18.320</i></li> </ul>	<p>to reference the new SMP adoption and ordinance date. This provision should also likely reference the effective date of the SMP, which is 14 days after Ecology approval.</p>

## 5. Other Issues to Consider

In addition to the issues discussed in the previous sections of this report, the following issue could be addressed as part of the periodic update process to produce a more effective SMP (Table 5-1 below).

Table 5-1. Other issues that could be addressed to produce a more effective SMP.

#	Issue	Review & Relevant Location(s)	Action
Table 5.1	1 Extra Shoreline Environment Designations listed	<p><b>Review:</b> Additional shoreline environment designations (SED) are listed in the SMP but are located solely outside the City of Battle Ground and its UGA.</p> <p><b>Relevant Location(s):</b></p> <ul style="list-style-type: none"> <li>• SMP Section 4.3</li> <li>• Table 6-1 Shoreline Uses Modification and Development Standards</li> </ul>	<p><b>Recommended:</b> The City will consider removing extraneous SEDs from the SMP, specifically listed under Table 6-1, that do not apply within the City or UGA limits, as they may confuse the reader.</p>