

**APPENDIX A**

---

Preliminary Shoreline Jurisdiction  
Letter



January 31, 2014

Elaine McMillan  
City of Ilwaco  
P.O. Box 548  
Ilwaco, WA 98624

Re: City of Ilwaco Preliminary Shoreline Jurisdiction

Dear Elaine:

The Watershed Company has developed the accompanying map of Preliminary Shoreline Jurisdiction as part of the City of Ilwaco (City) Shoreline Master Program (SMP) update. This letter describes the development of this map in detail.

## OVERVIEW

The Preliminary Shoreline Jurisdiction map shows the City's minimum shoreline jurisdiction based upon the Shoreline Management Act (SMA), the Washington Administrative Code (WAC) and Washington Department of Ecology (Ecology) guidance documents.

Under the SMA, the following features are regulated as Shorelines of the State:

- Rivers and streams with over 20 cubic feet per second (cfs) mean annual flow;
- Floodway and contiguous floodplain areas extending 200 feet from the floodway;
- Marine waters;
- Lakes 20 acres or greater in size;
- Shorelands 200 feet landward from the ordinary high water mark (OHWM) of marine waters and jurisdictional rivers, streams, and lakes; and
- Associated wetlands that are hydrologically connected to any of the shorelines described above, located within 200 feet of a jurisdictional waterbody, or are entirely/partly located within a jurisdictional waterbody's 100-year floodplain.

## SUPPORTING GIS DATA

A first step in developing the map of Preliminary Shoreline Jurisdiction was to collect and compare existing GIS datasets. GIS datasets from several agencies were reviewed to determine the most accurate data for the City. GIS datasets reviewed for mapping shoreline jurisdiction are listed below.

### **Shoreline data**

#### *Reviewed, included in mapping*

- Pacific County SMA Hydrological Delineations (University of Washington Olympic Natural Resources Center, School of Environmental and Forest Sciences; 2011)
- Combined Shoreline (University of Washington Olympic Natural Resources Center, School of Environmental and Forest Sciences; 2013)
  - Note that the above-two datasets are discussed in the document Final Report: Coastal MSP Priorities (2013)
- National Hydrography Dataset (NHD) (US Geological Survey; 2013)
  - Note that Hydrography (Washington Department of Natural Resources; 2013) is essentially the same as the NHD in the Ilwaco area
- National Wetlands Inventory (NWI) (US Fish and Wildlife Service; 2011)
  - Note that the NWI includes lakes and that this dataset was used in mapping the Black Lake shoreline

#### *Reviewed, not included in mapping*

- Shoreline (Pacific County, 2011)
- Washington State Marine Shorelines (Ecology, 2001)

### **Wetland data**

#### *Reviewed, included in mapping*

- National Wetlands Inventory (US Fish and Wildlife Service; 2011)

### **Flood data**

#### *Reviewed, included mapping*

- FEMA Preliminary DFIRM (Federal Emergency Management Agency; 2013)

Because no single dataset represented a best-fit of the approximate OHWM for all shorelines in the City, multiple datasets were used. The datasets used to map the OHWM in specific shoreline areas are described later in this letter.

While the shoreline jurisdiction shown in the map is built on the best available data, the level of accuracy is limited and may require ground-truthing at the time of a development action review. Each map depicting shoreline jurisdiction will therefore include the following disclaimer, derived from Ecology's recommendation:

*The features depicted on this map are approximate. They have not been formally delineated or surveyed and are intended for planning purposes only. Additional site-specific evaluation may be needed to confirm or verify the information shown on this map.*

## SHORELINE JURISDICTION

### Marine shorelines

The City features approximately one-quarter mile of **Pacific Ocean** shoreline. This shoreline and the area 200 feet landward of the approximate OHWM are included in the map of Preliminary Shoreline Jurisdiction. Additionally, per RCW 90.58.030(2)(f)(i), this shoreline qualifies as a Shoreline of Statewide Significance. The OHWM for this segment of the shoreline was based on the NHD.

### Lakes

Per RCW 90.58.030(2)(e)(iii), the minimum size limit for lakes to be designated as shoreline is 20 acres. In Ilwaco, only **Black Lake** (at approximately 33 acres), exceeds this threshold. This shoreline and the area 200 feet landward of the OHWM are included in the map of Preliminary Shoreline Jurisdiction. The NWI was the starting point for mapping the OHWM of Black Lake; however, the OHWM boundary for Black Lake was edited to better match the 2013 aerial photo.

### Rivers

Ecology GIS data were consulted to verify the upstream limits of river shoreline jurisdiction based on the US Geological Survey's recent study (2003)<sup>1</sup> of the 20 cfs cut-off. Based on this information, the City has two jurisdictional rivers that are included in the map of Preliminary Shoreline Jurisdiction, along with the area 200 feet landward of the OHWM.

First, the **Columbia River**, including Baker Bay, is jurisdictional. Moreover, because its mean annual flow exceeds 1,000 cfs, it is also considered a Shoreline of Statewide Significance (per RCW 90.58.030(2)(f)(v)(A)). To develop the most accurate depiction of the Columbia River OHWM, it was mapped using three GIS datasets: the Pacific County SMA Hydrological Delineations dataset, the NHD, and the Combined Shoreline dataset.

Second, the **Wallicut River** has a mean annual flow greater than 20 cfs beginning just downstream of Highway 101. On the map of Preliminary Shoreline Jurisdiction, the Wallicut River OHWM was mapped by digitizing the OHWM as interpreted from the 2013 aerial photo.

---

<sup>1</sup> [http://www.ecy.wa.gov/programs/sea/pubs/USGS\\_reports/WRIR%2096-4208.pdf](http://www.ecy.wa.gov/programs/sea/pubs/USGS_reports/WRIR%2096-4208.pdf)

### **Floodplains/Floodways**

Flood mapping is based on FEMA Preliminary DFIRM data. The area around the Wallicut River has floodplains that extend beyond the standard 200-foot shoreline jurisdiction through portions of the City. However, Ilwaco has no associated floodways within or adjacent to the City boundary.

### **Associated wetlands**

Existing wetland inventory information in the NWI was reviewed to identify any potentially shoreline associated wetlands. Ecology guidance states that an entire wetland is associated if any part of it lies within the area 200 feet from the OHWM of a Shoreline of the State. Further guidance states that wetlands that are hydraulically connected to a Shoreline of the State would also be considered associated, as well as wetlands within the 100-year floodplain. Wetlands that are separated by an obvious topographic break from the shoreline are not associated, provided they are outside the shoreland zone and provided that the break is not an artificial feature such as a berm or road.

NWI wetlands appearing to meet the above criteria were mapped as “potentially associated wetlands.” An exception to this was one wetland polygon located at the actively used dredge spoils disposal area at the Port of Ilwaco, which was not included based on City knowledge of this area. NWI wetlands that did not appear to meet the above criteria for associated wetlands are mapped as “other wetlands.”

The Preliminary Map of Shoreline Jurisdiction shows wetland areas beyond 200 feet of the OHWM that are potentially associated wetlands due to their location in the 100-year floodplain. In particular, the area of the City located to the east of the Wallicut River includes several potentially associated wetlands.

### **OPTIONAL SHORELINE JURISDICTION BOUNDARIES**

The City has the option of expanding shoreline jurisdiction to include lands necessary for the entire 100-year floodplain and/or critical area buffers. The legislative intent for sole regulation under an updated SMP includes the caveat that if a local government’s SMP does not include “land necessary for buffers for critical areas,” then its critical areas ordinance (CAO) will continue to regulate critical areas and floodplain that are partly within the normal SMA jurisdiction and their buffers. The SMP also will apply within shoreline jurisdiction, resulting in dual coverage by both the CAO and SMP.

The City can voluntarily extend shoreline jurisdiction to include critical area buffers and/or floodplain that are beyond the usual SMA jurisdiction. Extending SMA jurisdiction can reduce regulatory duplication in the future. This is an issue that should be carefully considered by the City. The attached maps currently do not include expanded shoreline jurisdiction to include critical area buffers or floodplain.

McMillan, E.  
January 31, 2014  
Page 5 of 5

Please call if you have any questions.

Sincerely,

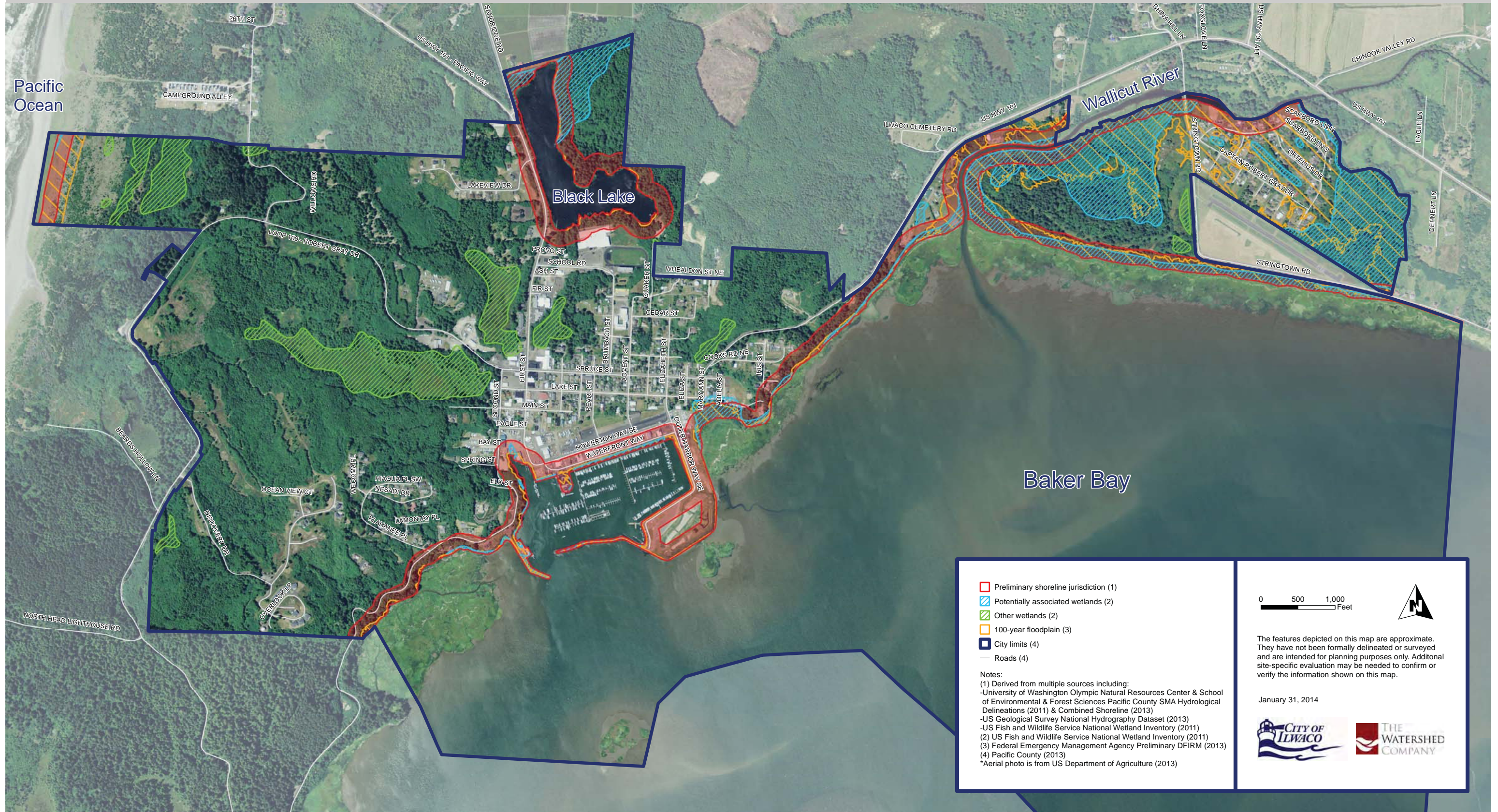
A handwritten signature in black ink that reads "Mark J. Daniel". The signature is written in a cursive style with a large, stylized initial "M".

Mark Daniel, AICP  
Associate Planner

Enclosure

# City of Ilwaco Shoreline Master Program Update

# Preliminary Shoreline Jurisdiction



	Preliminary shoreline jurisdiction (1)
	Potentially associated wetlands (2)
	Other wetlands (2)
	100-year floodplain (3)
	City limits (4)
	Roads (4)

Notes:  
 (1) Derived from multiple sources including:  
 -University of Washington Olympic Natural Resources Center & School of Environmental & Forest Sciences Pacific County SMA Hydrological Delineations (2011) & Combined Shoreline (2013)  
 -US Geological Survey National Hydrography Dataset (2013)  
 -US Fish and Wildlife Service National Wetland Inventory (2011)  
 (2) US Fish and Wildlife Service National Wetland Inventory (2011)  
 (3) Federal Emergency Management Agency Preliminary DFIRM (2013)  
 (4) Pacific County (2013)  
 \*Aerial photo is from US Department of Agriculture (2013)

0 500 1,000  
Feet

The features depicted on this map are approximate. They have not been formally delineated or surveyed and are intended for planning purposes only. Additional site-specific evaluation may be needed to confirm or verify the information shown on this map.

January 31, 2014