City of Port Angeles  
Shoreline Master Program  
Environmental Designations

Executive Summary

Justification for how designations will protect shoreline resources in conjunction with the Comprehensive Plan, Environmentally Sensitive Areas Protection Ordinance, and Zoning Code.

The following narrative is intended to analyze the level of environmental protection provided by the Shoreline Master Program in concert with other existing land use codes.

The SMP will work together with the existing Comprehensive Plan, City Zoning Ordinance, Title 17 PAMC and the City's Environmentally Sensitive Areas Protection Ordinance, Title 15 PAMC to ensure that the ecological functions existing on the shoreline will not be diminished by actions taken under the SMP.

THE ENVIRONMENTAL DESIGNATIONS

Urban Conservancy Low-Impact (UC-LI)

The purpose of the Urban Conservancy-Low Impact (UC-LI) Environment is to protect and restore ecological functions in low intensity settings, while allowing some low-impact uses.

An Urban Conservancy-Low Intensity environment designation is assigned to shorelands that are designated Open Space in the City’s Comprehensive Plan, are located along active drift cells, feeder bluffs, wetlands, or other areas that should not be more intensively developed, and which retain important ecological functions, even though partially developed. (emphasis added)

Ocean View Reach (Segment A)

Beginning at the west boundary of the city at Dry Creek, extending east to the east edge of the street right-of-way east of Ocean View Cemetery. This reach does retain important ecological functions even though it is partially developed.

This reach is characterized by steep, high bluffs, rising as much as 130 above sea level. Currently two land uses occupy the area. One is the city's closed landfill (now transfer Station and compost facility). The second, to the east of the transfer station is Ocean View Cemetery. Both existing uses are owned by the city. No changes of use are anticipated for the future.

The reach has experienced impacts from human activity in the past. Due to past practices as the former landfill, refuse has been exposed and fallen to the beach. This continues to occur from...
time to time. A portion of the shoreline was armored with a seawall bulkhead and the bluff pulled back to remove the refuse and provide a stable angle of repose. A second area to the east of the seawall has eroded and exposed refuse is again threatening to fall onto the beach. Current city plans do not include any new uses or further development of the site within 200' of the shoreline or marine bluff. Plans are being developed to resolve the issue in a manner acceptable agencies with jurisdiction.

Approximately 825 feet east of the transfer station property, a 72" concrete water line exits the base of the bluff and lays on the beach surface the entire length of the shoreline east to the industrial use (Nippon Paper) at the base of Ediz Hook. The water line is protected from damage by rip rap or large stones placed to deflect wave actions. This armoring is periodically repaired.

The reach in which the armored industrial water line exists contains the Ocean View Cemetery. No graves occur within the 200-foot shoreline jurisdiction and the bluff is reasonably well vegetated. No development is planned to occur within the shoreline area, however, the bluff top will likely remain lawn, rather than forested.

With the exception of the 825-foot segment, human impacts are significant and the reach does not meet the "relatively free of human impacts" criteria for the segment to have been designated as Natural.

**Comprehensive Plan**

This entire segment is designated as Open Space on the City's Comprehensive Plan Land Use Map. The Open Space designation clearly states;

"The Open Space category includes areas of the City that contain unique or major physical features, such as marine shorelines, bluffs, ravines, major streams, wetlands, critical wildlife habitat, and other natural areas deemed of significant importance to the community. This category also includes park and recreational uses. The development of natural open space areas should be limited to only that which is necessary and does not degrade the significance of the area". (emphasis added)

**Zoning**

The entire reach is zoned Public Buildings and Parks (PBP). The purpose of the PBP zone is as follows:

*This is a zoning designation for publicly-owned property, or property less suitable for development by reason of its topography, geology, or some unusual condition or situation. Much of the land so designated may best be left as "green belts". Except for low density private residential uses, permitted uses are mostly public utilities and large civic facilities. This zone provides the basic urban land use pattern for public facilities, open space, and environmentally sensitive areas where public interests are directly involved and with allowances for very low density private residential use, subject to environmental impact mitigation. (Emphasis Added)*

The current zoning could allow subdivision and sale of property for development as single family residential uses with a minimum 7,000 square foot lots. The list of permitted uses only includes public facility and recreational uses. It is unlikely that the current uses in the reach will
be replaced or added to. Ocean View Cemetery is the only city owned cemetery. There is adequate area for many years of continued use outside of the shoreline jurisdiction. The bluff is forested and no graves or other development exist within 200' of the shoreline (other than the IWL armoring).

Environmentally Sensitive Areas Protection

PAMC 15.20 designates all marine bluffs as Environmentally Sensitive Areas. Protections provided in PAMC 15.20 include the requirement that a 50' buffer of undisturbed native vegetation be provided at the top of the marine bluff. Therefore, any future development in this environment designation must be setback a minimum of 50' and in locations where impacts have encroached into the buffer, are required to reestablish the vegetation in the buffer area.

It is unlikely that any development along this reach will occur, other than pulling existing refuse back from the bluff face. The City will continue to use the closed landfill as a transfer station and the cemetery will remain essentially as it is. Three potential access points to the beach may be developed in the future for recreational access.

Hill Street wetland (Segment G)

The area delineated as wetland located at the base of the marine bluff, extending west to the point it meets the mill lagoon.

This small area is included in the SMP due to its association with the mill lagoon and the Port Angeles Harbor. Property ownership is combined between the City, Clallam County and the Port of Port Angeles, all of which are public agencies. No private ownership in this area exists. The Port of Port Angeles and Clallam County are both aware of the restrictions included in the UC-LI designation. The Port has taken the responsibility for having the wetland delineation done and are supportive of protecting the site. Clallam County owns parcels of land that are encumbered by the now abandoned portion of the industrial water line. The City intends to make use of the abandoned portion of the IWL as a conduit for new utilities. The County has no intentions to develop the area. The environment specific regulation for the UC-LI establishes a 200-foot VCA which restricts development to only that which will protect existing utilities.

The Comprehensive Plan

The Comprehensive Plan Land Use Map identifies this area as being designated Open Space. The Open Space designation clearly states, "the development of natural open space areas should be limited to only that which is necessary and does not degrade the significance of the areas."

Zoning

This area is zoned Public Buildings and Parks, further restricting potential uses (see zone purpose statement above).

Wetlands Protection Ordinance

PAMC 15.24: clearly defines what uses may occur in a wetland, buffer requirements and other regulations established to protect these sensitive areas. Since the SMP only requires that a wetland associated with the shoreline be included in the shoreline designations, but does not include an additional 200 feet upland from the OHWM as does the marine shoreline, the
additional buffer area provided for in PAMC 15.24 will actually provide additional protection to the wetland over that provided by the SMP.

**High-Intensity Industrial (HI-I)**

The purpose of the High-Intensity Industrial environment is to provide for high intensity water-oriented industrial uses.

Only one area of the shoreline in Port Angeles is designated as HI-I. That area includes shoreline segments of the Strait of Juan de Fuca, Port Angeles Harbor, and the lagoon at the base of Ediz Hook, three distinctly different water bodies. In spite of the differences in shoreline character between the three shorelines, the 200-foot jurisdictions overlap with each other in areas where less than 200 feet of uplands separates the shorelines. This area is owned in part by Nippon Paper Industries and portions are leased to Nippon. A few other small industrial operations exist in the vicinity, including a fuel terminal for marine shipping use, a spill response operation, and a log handling/storage facility.

A 50' building setback and vegetation conservation area (VCA) is designated along both the Strait of Juan de Fuca and Port Angeles Harbor shorelines. Currently many of the existing industrial buildings are located within the 50' setback/VCA, making them nonconforming. Little or no riparian vegetation exists in this environment designation along the Strait of Juan de Fuca or the Port Angeles Harbor shorelines. The lagoon shoreline contains several areas supporting riparian vegetation.

**The Strait of Juan de Fuca shoreline (Segment C)**

This reach is heavily armored with large stone rip rap that extends from the Nippon mill east the entire length of the Hook. A short portion (~700') of the shoreline near the west end of the Nippon mill has lost its armoring and appears to be forming a small pocket beach, however, Nippon is concerned about further erosion having adverse impacts to their facilities and would like the section rearmored. The armoring of the north shore of Ediz Hook is under the direction of the U.S. Army Corps of Engineers.

The primary emphasis in designating these reaches High-Intensity Industrial was to protect and facilitate the continuation of mill operations without their becoming nonconforming, either as a use or for individual structures. Very little of the Nippon operation is taking place near the Strait of Juan de Fuca shoreline. Site development is generally focused on other portions of the site.

**Port Angeles Harbor shoreline (Segment I)**

The Port Angeles Harbor shoreline is also heavily armored. This segment is the most active portion of this area, containing as many as seven existing overwater structures. These are primarily used for industrial purposes, including the refueling of marine transport ships, log handling, and warehousing. The heavy shoreline armor is interrupted for approximately 200' where a small pocket beach has formed. This beach is located directly south of the outlet channel that connects the harbor with the lagoon. This reach contains the Port of Port Angeles' log handling operations. Again, due to the major industrial uses in close proximity to the shoreline, no riparian vegetation exists through this reach.
Because of the existing uses, no public access to the shoreline is available through this reach. The Olympic Discovery/Waterfront Trail follows city streets through this area.

**The Mill pond Lagoon (Segment H)**

The third segment of the HI-I environment is the lagoon (former log pond). This segment of shoreline contains a wide variety of conditions. The lagoon makes up approximately 4,500' of shoreline.

**The west shoreline of the lagoon**

The west shoreline has been armored with sheet pile in portions that are in close proximity to the mill operations and the water treatment clarifiers. Other portions are more natural in character and contain shoreline vegetation.

**The east shoreline of the lagoon**

This segment has a similar mix of conditions. To the north end a parking lot is adjacent to the shoreline and supported by sheet pile. A more natural shoreline environment exists to the south of the parking area, however, the major arterial, Marine Drive, is located within 50' of the shoreline and the road prism is supported to within 20' of the OHWM in places. A second gravel surfaced parking area exists to the south of where Marine Drive approached the lagoon. This area has in the past been used by Nippon for truck parking, chip storage, and is currently hosting construction materials and equipment associated with the construction of the cogeneration facility at the mill site. South of this parking area, the shoreline returns to a more natural character with beach and upland vegetation. This section is approximately 700' in length.

The lagoon shoreline segments requires a 20' building setback and VCA. As existing uses currently do not provide any setback or riparian vegetation, existing parking facilities on the east side of the lagoon will become nonconforming and any future development will require additional separation from the shoreline.

The lagoon outlet is a narrow channel that is armored on both sides with sheet pile. The channel is approximately 70' in width south of Marine Drive and narrows to approximately 17' north of Marine drive. Little riparian vegetation exists along the channel.

Developments on the shoreline of the Strait of Juan de Fuca and Port Angeles Harbor will be required to observe a 50' building setback and VCA. Riparian vegetation will be required through any shoreline substantial development permit. Further armoring is only allowed for the protection of existing facilities and structures or if needed in a restoration project. This will be a distinct change in approach to new uses and developments in the area over the existing SMP requirements.

**Comprehensive Plan**

The water area of the lagoon is designated primarily as Open Space, while the uplands are designated Industrial. An imprecise margin separates the two designations. The Open Space designation clearly states, "the development of natural open space areas should be limited to only that which is necessary and does not degrade the significance of the areas."
Zoning
The uplands areas are zoned Industrial Heavy, while the lagoon and uplands along the south side of the lagoon are zoned Public Buildings and Parks. The purpose statement for the PBP zone is stated above.

The southern portion of the lagoon (Segment F)
This segment is defined by the marine bluff and the IWl that travels along the base of the bluff in this area. Vegetation in that vicinity is made up primarily of native trees, shrubs, forbs and grasses. This segment is designated Urban Conservancy-Recreation and will be discussed further in another section.

High-Intensity Marine (HI-M)
The purpose of the High-Intensity Marine (HI-M) Environment is to provide for high-intensity water-oriented commercial, transportation, recreation, industrial uses, boat building and repair, marina facilities, the Coast Guard base, and ancillary uses.

This environment designation is very similar to the HI-I environment with fewer restrictions on the types of uses allowed. There are two segments of the Port Angeles shoreline designated HI-M.

East end of Ediz Hook (Segment E)
This segment extends from the east tip of Ediz Hook to a point approximately 130' east of the fenced radio antenna enclosure on the south side of Ediz Hook Road. This segment includes the U.S. Coast Guard Station. The reach covers approximately 2,400' of shoreline on both the north and south shores of Ediz Hook that are not part of the Coast Guard Base. As in other segments of the Strait of Juan de Fuca shoreline, the northern shoreline is heavily armored with large stone rip rap. This armoring is maintained by the U.S. Army Corps of Engineers and at the west end of the HI-M segment come to within a few feet of the road edge and widens to approximately 45 feet at the east end. This widened area serves to provide a parking area for a variety of uses located at the east end of the Hook (excluding the Coast Guard Base). These uses include a commercial aquaculture facility, The Puget Sound Pilots office and pier, a public boat launch, a public park (marking the end of the Waterfront Trail), public restrooms, and a closed restaurant building. Because of this concentration of uses both public and private, the area is a heavily used. There is some anticipation that additional public support uses may develop in this area.

Comprehensive Plan
The Comprehensive Plan designates this reach primarily as Open Space, with an area designated Commercial on the south side of the Hook in the vicinity of the existing public and commercial activities.

Zoning
Ediz Hook in this area is zoned with a combination of Commercial Arterial (CA) and Industrial Heavy (IH) on the south side of Ediz Hook Road and Public Buildings and Parks (PBP) on the
north side of the road. The waters of the Port Angeles Harbor are zoned Industrial Heavy. These zoning designations do not provide significant environmental protection.

Much of the Port Angeles Harbor shoreline on the south side of Ediz Hook maintain a more natural character than most other shorelines in Port Angeles. The narrow nature of the hook restricts the types of uses that may be allowed. Scant area between the OHWM and the roadway exists. The VCA in this reach has been established so that the entire area between the OHWM and the base of the road support prism is included. The eastern area used for aquaculture facility and adjacent restaurant business (now closed) is the primary portion that has been armored with hard materials. The land occupied by the aquaculture operation is built entirely on fill material. This area also contains a large area of pavement on the beach that extends below the MLLW. This feature is a major restoration target identified in the Restoration Plan.

It should be noted that even though the U.S. Coast Guard Base is designated as HI-M, there will be little affect to that portion of the shoreline due to the independent nature of Federal land reserve areas. Local and State regulations do not apply on the upland portions of such properties.

**Boat Haven Reach (Segment J)**

The second area of the shoreline designated as HI-M is the reach extending from the west end of the Boat Haven Marina to the west side of the Valley Creek estuary. This area is characterized by several industrial uses including boat manufacture and repair, top side repair facility for ocean going ships, and a dock used for cargo ship loading and unloading. Until recently, a plywood manufacturing mill also existed in this reach. That mill has now closed (since the early drafting of the SMP) and the property owner (Port of Port Angeles) is in process of clearing the site for new marine industries facility. Portions of the site are still being leased for use in debarking and storage of logs prior to being loaded for export. Completion of the mill demolition is anticipated to take as much as five years or more.

A major use in this reach is the Boat Haven Marina which occupies the western portion of the reach. The marina is owned by the Port of Port Angeles who's master plan indicates an expansion of the marina could be possible in the future. No specific plans have been developed, however, conceptual drawing indicate that a vegetated buffer would be included on the east jetty and enhanced vegetation would be included between Marine Drive and the Marina's shoreline. Very little change to the existing marina shoreline should be expected due to constraints of surrounding uses. The VCA required for this designation does not apply to the marina's jetties, however, the east jetty does have adequate area to enhance vegetation.

Only water oriented uses requiring direct water access are allowed to be located within the VCA in the High intensity Marine environment.

Very little riparian vegetation exists in this reach due to the historically intense uses in the area. Some trees exist between the marina and Marine Drive, however, they are not thriving in that location, probably due to a combination of harsh environmental conditions and the choice of improper species (nonnative ornamental cherry trees). The city is investigating replacement of the trees with more appropriate species. This strip of land also contains the abandoned IWL which is exposed above ground along the marina's shoreline. The 200' shoreline jurisdiction on the south side of the marina extends to the base of the marine bluff and beyond in some areas. The bluff and some businesses in this area are functionally and physically separated from the actual shoreline by the IWL and Marine Drive. No ability to directly access or impact the
shoreline is anticipated from uses on the south side of Marine Drive. Also in this area, the Environmentally Sensitive Areas Protection ordinance, PAMC title 15, establishes a 50' buffer of undisturbed native vegetation extending from the toe of the marine bluff to further protect the resource.

**Comprehensive Plan**

The Comprehensive Plan designation for this reach is primarily Industrial, however, an upland strip roughly matches the Olympic Discovery/Waterfront Trail route and extends south across Marine Drive to beyond the shoreline jurisdiction.

**Zoning**

This entire reach, with the exception of the area south of Marine Drive is zoned Industrial Heavy which does not provide additional environmental protection. This reach and the High-Intensity Industrial reach in the vicinity of the Nippon paper mill is the primary industrial area of the city located near the water. Although other areas for industrial development exist in Port Angeles, these two segments provide the only industrialized shoreline access in the city (since the closure of the Rayonier Mill in 1999).

**Environmentally Sensitive Areas Protection ordinance**

The area south of the Boat Haven Marina and Marine Drive contains the marine bluff which requires that a 50' buffer of undisturbed native vegetation remain.

**High-Intensity Mixed Use (HI-MU)**

The purpose of the High-Intensity Mixed-Use (HI-MU) Environment is to provide for public access and high-intensity water-oriented commercial, transportation, public access, institutional, and recreational uses especially appropriate to downtown Port Angeles or other mixed-use sites. Two segments have been designated as High-Intensity Mixed Use.

**The Port Angeles downtown**

The downtown segment extending east from Cherry Street (extended line north of Front Street) to the east end of the Hollywood Beach (approximately midway along the Red Lion property) is designated HI-MU. This reach has relatively intense uses on the east end with very little developed use on the west end. The entire reach, with the exception of Hollywood Beach is heavily armored with large stone rip rap. The segment located between Oak Street and the Coho Ferry terminal is currently undergoing a redevelopment project.

The section extending from Peabody Creek on the east to the west side of the Coho Ferry terminal is occupied by the Landing Mall and the ferry terminal. Both of those uses are located placed on over water structures and/or artificial fill. City Pier Park and Hollywood Beach are located east of Peabody Creek. The park area is heavily armored, but Hollywood Beach is a small sandy beach area. This downtown beach is a popular location for a number of recreational activities.

Because the area is the center of town and a focal point for local citizens and visitors alike, the mixed use designation provided the best opportunity to continue the intensity of uses expected in
a central city downtown area. Much of the reach is located south of Railroad Avenue which provides both a physical and functional separation from the waterfront. Existing and/or new uses are not anticipated to create adverse impacts to the shoreline.

This segment is currently planned for significant redevelopment as part of the Waterfront and Transportation Improvement Plan (WTIP). Work on the first phase began in October. This project is anticipated to extend over a course of years in several phases. Because of this, the mixed use designation was drafted to allow flexibility and to accommodate the anticipated uses. As part of the project, much of the rip rap along the currently vacant 'Oak Street property' will be removed and areas converted into pocket beach areas. The site will be developed as a park, including portions of the privately owned parcel to the south of the waterfront. The park will contain public amenities such as restrooms and may include a rebuilt Fiero Marine Life Center (currently located in City Pier Park at the east end of this reach). This redevelopment into public park is anticipated to permanently enhance and protect this section. Additionally, improvements to Hollywood Beach on the east end of this segment will enlarge and enhance the beach area. This project will provide long term enhancement and protection to the beach. The remainder of the segment will be enhanced with public amenities including an improved pedestrian walk with viewing and seating elements, new trees and enlarged planting space to add to the vegetation in the area. Low impact development rain gardens will be constructed to manager stormwater and provide LID demonstration areas. These improvement will also tie into the Valley Creek restoration area and move the Waterfront Trail closer to the shoreline and off of city street sidewalks.

It is under consideration that once the new park area is constructed, the area might be rezoned (along with the Valley Creek Estuary) to Public Buildings and Parks to provide further protection to that portion of the shoreline.

**Western Ennis Creek Reach A.K.A Rayonier (Segment O)**

The second area designated as Mixed Use is the west side of the now vacant former Rayonier Mill site, extending from the west boundary of the site to the centerline of Ennis Creek. Future plans for this area have not been settled upon and site remediation is now in its second decade. Because of the slow pace of remediation of site conditions, the slow economy, and other factors, redevelopment of the site is not anticipated to occur near future.

The Mixed Use designation in this reach has the largest VCA applied in any reach. The VCA is 100' wide in this area and any development would be required to provide trail access to the shoreline, and only water dependent uses would be allowed within the VCA.

**Comprehensive Plan**

The western section of the former Rayonier Mill site (west of Ennis Creek) is designated as Open Space over much of the southwestern portion of the site and extending south along the Ennis Creek corridor. The northern portion is designated Industrial. This designation covers much of the northern shoreline including the remnant jetty and pier and extends over the mouth of Ennis Creek. The Open Space designation continues south in a manner that one would think the intent was to designate Ennis Creek as Open Space. It would appear that a mapping error occurred, because the OS designation does not cover the stream channel well. Correcting the location of the boundaries of the Comprehensive Plan designations is under consideration and pending further action.
Zoning

The site is primarily zoned Heavy Industrial with a strip following the marine bluff and covering the southern portion of the site zoned Public Buildings and Parks. It is difficult to know what will become of the site. Some of the site has been purchased by the City of Port Angeles for use in remediation of combined sewer overflow issues. Some realignment of the Olympic Discovery/Waterfront Trail will occur as part of that project. It is assumed that the property ownership has been resolved, the city will take the opportunity to revise both the Comprehensive Plan designation and the site zoning. The current zoning has been left in place at the request of the property owner and the HI-MU designation also is the preferred choice of the property owner.

Environmentally Sensitive Areas Protection

PAMC Title 15 designates Ennis Creek as a Type III stream and requires a 75’ buffer of undisturbed native vegetation remain along both sides of the creek. Additionally, those portions of the site where the marine bluff is located on the site will be further protected by the required 50’ buffer at the toe of the bluff.

Urban Conservancy-Recreation (UC-R)

The purpose of the Urban Conservancy-Recreation (UC-R) Environment is to protect and restore ecological functions in urban and developed settings and to provide public access and a variety of recreation and park uses. (emphasis added)

This designation provides some environmental protection through limits to uses allowed. Areas designated as UC-R are primarily intended to provide for improved public access and protect those areas from reduced public access.

Ediz Hook (Segment D)

Both the north and south sides of the middle reach of Ediz Hook are designated UC-R. The manner in which the Environment Specific Regulations are drafted, the outer and inner shorelines are treated quite similar to each other. However, the two shorelines are quite different. Access to the north shore (Strait of Juan de Fuca) is not restricted although it is rather difficult due to the large stone rip rap armoring. Only able bodied persons are capable of scrambling over the rock. The south shore is much more beach like and accessible. Recent actions have taken place to remove derelict structures on the south side of the hook and restore areas to a more natural character.

The draft SMP would allow for only public access features such as rest stops, viewing platforms, or picnic areas. These structures would be limited to a maximum of 15’ in height. Although these restrictions may seem to provide an adequate balance between protection/restoration and public access without allowing any high intensity uses, the provision would allow such structures every 1,200’ along the shoreline. This would provide seven opportunities for public access on the north shore, the construction of such facilities would require extensive work in/on/over the rip rap. Additionally there is no area on the north side of the road for parking. This results in parking on the south shore for north shore access causing pedestrians to cross the street.
There is available parking at the east end of the hook (designated HI-M) and the shoreline is more accessible (still not easy access over the rocks). Providing additional points to stop and park along the north shore in the UC-R may not be a good idea.

Conversely, on the south shore, access to the water is much easier across the more beach like area between the roadway and the water. Also, there is adequate width where additional parking could be developed while staying an appropriate distance from the water. The draft SMP also would allow the same access amenities as the north shore and at the same rate of one per 1200 linear feet. As on the north side, this would result in 7 such areas. This may be too many to be considered restorative of the environment.

No structural shoreline armoring is permitted except to protect the existing road and utilities. That armoring is required to be located in as close proximity to the road base as possible. Overwater structures are prohibited as are non-water-oriented structures.

**Comprehensive Plan**

The Comprehensive Plan Land Use Map designates the entire Ediz Hook as Open Space. The Comprehensive Plan also includes a policy stating that the City intends to create an Ediz Hook Master Plan.

**Zoning**

The center segment of Ediz Hook (Tesoro plant to the HI-M designation) is mixed zoning between Public Buildings and Parks, PBP and Industrial Heavy (IH). The north shoreline is entirely zoned PBP, which offers relative strong protection to that shoreline. The south shore is primarily zoned IH. Very few restrictions to development are included in the IH zone. This seems to be in conflict with the Comprehensive Plan and current policy would indicate that the south shore area should be a different zone.

**Environmentally Sensitive Areas Protection Ordinance**

The SMP environmental designation will be the strongest protection to ecological functions for this portion of the hook. The only environmentally sensitive area is the shoreline. PAMC 15.20 protects shorelines through the Shoreline Master Program and the Shoreline Management Act.

**South end of the Nippon lagoon (Segment F)**

This area is primarily steep marine bluff, with a narrow strip at the toe of the bluff south of the OHWM. The only development in the segment is the abandoned section of the IWL. No formal public access to this segment exists, however, social trails do exist. The property at the base of the bluff along the shoreline belongs to Nippon Paper Industries. Much of the remainder of the bluff is owned by either the city or Clallam County. Nippon has no plans to develop this area of shoreline and has publicly objected to proposals to allow public access to the Strait of Juan de Fuca shoreline to the northwest. Crown Park is located at the top of the bluff between "M" Street and Evans Street. The city is planning to extend and improve the Olympic Discovery Trail up Hill Street and across the face of the bluff on an abandoned railroad grade. No other development is planned.

The VCA is designated to extend 200' from the OHWM.
Eleven single family residences are developed on properties above the top of the bluff. Several of those properties extend over the top of the bluff and partway down the slope. These residential parcels have been designated as Shoreline Residential (SR) in the SMP. The SR designation would allow for uses ancillary to single family residential uses would be allowed for these area if no other protection was offered.

**Comprehensive Plan**

The area is designated as both Open Space (toward the top) and Industrial (at the base). These designations are separated by an imprecise margin allowing for flexibility and interpretation of possible land uses.

**Zoning**

The entire marine bluff area is generally zoned as Public Buildings and Parks. Private parcels containing single family residences (including areas of the marine bluff) are zoned RS-7 (single family residential) as well as some publicly owned parcels also zoned RS-7. These public parcels deserve to be analyzed and rezoned from RS-7 to PBP.

**Environmentally Sensitive Areas Protection ordinance**

The marine bluff is protected as an environmentally sensitive area, requiring 50' buffers at both the top and toe of the bluff. The ordinance further protects the bluff by disallowing developments and vegetation removal on the bluff face.

**Segments east of downtown designated UC-R (Segments N & P)**

Two segments east of downtown are designated UC-R. One segment (N) located just east of downtown and ending at the former Rayonier Mill site, contains Francis Street Park. A second segment extends from Ennis Creek east to Morse Creek.

The environmental designation extends from the OHWM to the top of the marine bluff. The property contains the Olympic Discovery/Waterfront Trail and is owned by the City or Clallam County. The trail is a former railroad grade and is therefore heavily armored. The IWL follows the trail route as far as the Rayonier site and will contain utility lines to carry stormwater and sewage to the city's wastewater treatment plant. No other development is planned for this segment.

Although this segment is heavily armored to protect the trail, landslides are common. The city takes responsibility for trail maintenance and when slides occur, the sloughed materials (including vegetation) are pushed off the trail and deposited over the rip rap to supply the material into the marine currents.

These segments contain small areas of single family residential uses. The residential uses all exist at the top of the bluff and in the eastern segment are set well back from the top of the marine bluff. The designated VCA extends to the top of the marine bluff.

**Comprehensive Plan**
The Comprehensive Plan Land Use Map designates these segments as Open Space. Policies located in the Conservation Element support maintaining the trail and the marine bluffs and reducing impacts in those areas.

**Zoning ordinance**

The entire eastern waterfront, with the exception of the former Rayonier mill site is zoned PBP. The Public Buildings and Parks zone would support single family uses or ancillary uses, much of the property is owned by the city and is not considered for further development.

**Environmentally Sensitive Areas Protection ordinance**

The marine bluff is designated as an environmentally sensitive area, requiring an undisturbed buffer of native vegetation at both the top and toe of the bluff. In the western segment between downtown and the Rayonier site, 18 residential properties extend into the 200 foot shoreline jurisdiction. These properties were subdivided in such a way that the north property line is closely associated with the top of the marine bluff and no private property ownership extends to the base of the bluff. Most of the homes in this segment are closer to the top of the bluff than would be allowed under current regulations.

The eastern segment contains private property that extends over the top of the bluff. With the exception of a few parcels located in the Lees Creek ravine area, all of the existing residences are set well back from the top of the bluff and none exist in the 200' shoreline jurisdiction. The Lees Creek area does have two houses that encroach into the shoreline jurisdiction and one property corner that comes within 30' of the shoreline. Four parcels exist that are currently undeveloped and may have potential for future development. It is due to the potential for development on these seven parcels that the environmental designation included the entire parcel and did not result from topographic characteristics as the remainder of the segment did.

**Comprehensive Plan**

The Comprehensive Plan designates the western segment between downtown and Rayonier is designated as Open Space. The city intends that this segment will remain developed only as the Olympic Discovery/Waterfront Trail.

The east side of the Rayonier site is located within Clallam County and the City's Comprehensive Plan does not indicate a designation for the eastern reach.

**Segment designated UC-R at the Valley Creek estuary (Segment K)**

The Valley Creek estuary is located between Cherry Street and Pine Street (extended) on the Harbor waterfront. The estuary was created as a mitigation for industrial development to the west. The shoreline portion east of the centerline of Valley Street (under which Valley Creek exists in a culvert) to a line projected north from Cherry Street is designated UC-R. The estuary was developed using volunteers and has become a well loved downtown feature.

**Comprehensive Plan**

The estuary is designated Industrial in the Comprehensive Plan. This designation is a remnant of past conditions and there has been discussion regarding an amendment to the Comprehensive Plan to make the designation reflect the vision of Port Angeles citizens.

**Environmentally Sensitive Areas Protection ordinance**
Valley Creek is a type III stream and is afforded a 75' buffer extending upland from the OHWM. The buffer is required to be undisturbed native vegetation.

**Zoning ordinance**

As with the Comprehensive Plan designation, the zoning remains as it has been since before the creation of the estuary. Currently the zoning is Industrial Heavy, offering no environmental protection. The property is still owned by the Port of Port Angeles. The existing use on the abutting property to the west has closed and the Port is in the process of demolishing the vacant mill structures. The Port is planning to redevelop the site. It is incumbent on the City to review and amend both the Comprehensive Plan and the zoning ordinance to a more protective lower intensity of use. The west side of the Valley Creek estuary has the same Comprehensive Plan designation and zoning as the east side, however, the SMP designation is HI-M.

**Shoreline Residential (SR)**

The purpose of the Shoreline Residential (SR) Environment is to allow residential development and uses and allowing residential redevelopment while protecting structures and ensuring that the existing ecological functions are not diminished. A Shoreline Residential Environment designation will be assigned to shorelands that exist as single-family residential developments or are planned and platted for residential development.

Parcels designated as Shoreline Residential exist in two general areas. One area is located on the western bluffs between the Nippon Mill and Ocean View Cemetery. The second area is the reach east of the former Rayonier Mill site.

**The western reach (Segment B)**

This reach consists of 45 single family parcels, 18 of those are undeveloped. These parcels extend from behind the top of the marine bluff to the OHWM (and beyond in some cases). The draft SMP establishes a VCA that extends 50' landward of the top of the marine bluff. The 200' shoreline jurisdiction extends landward of the top of the bluff a minimum of 50' up to approximately 90'. Some of the houses are located as close to the top of the bluff as 15'. Typically, these residences have existed for some time and many may pre-exist the Shoreline Management Act. The yards are all landscaped leaving little other than lawn and a few shrubs in the VCA.

This area has sheer bluff faces with little or no vegetation. The shoreline is armored for the IWL. No formal public access is provided to the shoreline in this area. The Olympic discovery Trail follows Milwaukee Drive, which is well landward of the shoreline jurisdiction.

**Comprehensive Plan**

The Comprehensive Plan designates the shoreline waterward from the top of the bluff (generally) as Open Space. The uplands portion of this reach is generally located within the imprecise margin between designations. Landward of the bluff line the designation is Low Density Residential.

**Zoning Ordinance**
The area is zoned for residential uses at various densities. One section is zoned Residential Trailer Park (RTP) and contains up to 16 residential trailers/manufactured homes. The site is approximately 4.5 acres in area (Above the top of the marine bluff). These residents are leasing the home sites and have little impact on shoreline conditions. The single property owner would have the means to physically impact the shoreline conditions.

This site is one of four areas with the RTP zone applied. It is conceivable that this site might be sold, rezoned and subdivided in the future. All the surrounding residential properties are zoned RS-11, which has a minimum lot width of 75’ and a minimum lot area of 11,000 SF. With these restrictions, only 10 residential lots could be created with bluff top sites of 75’ in width. This would lower the overall density of the site, but create multiple ownership across the bluff top.

**Environmentally Sensitive Areas Protection**

The marine bluff is designated as an environmentally sensitive area requiring a 50’ buffer of undisturbed native vegetation. New developments would be subject to this requirement. Redevelopment projects must make some improvements to disturbed buffers.

**The eastern reach (Segment P)**

This segment contains residential uses on typically larger lots than the western reach. The area is largely located in the City’s Eastern Urban Growth Area. Much of the 200’ shoreline jurisdiction in this reach does not extend far enough upland to impact the majority of home sites. The Shoreline Residential designation in this reach is developed so that only properties above the top of the marine bluff are included in the SR designation. Only 4 homes along the 2-mile reach are located within the shoreline jurisdiction. Thirty six parcels have the SR designation applied to them. With few exceptions (13 parcels) all of the existing lots are developed with single family homes and further development within the shoreline jurisdiction is unlikely. Although many of the lots extend from the uplands over the marine bluff to its toe and farther in some cases, the lots tend to be long with large land areas above the marine bluff and outside of the shoreline jurisdiction.

The sub-segment adjacent to the Lees Creek ravine have been designated using property lines rather than using the top of the marine bluff to demark the boundary of the jurisdiction. This segment contains 7 parcels owned by 4 different individuals. Three of the 4 homes located in this reach that are also located within the shoreline jurisdiction are in this sub-segment. Except for two parcels, adequate buildable area outside of the shoreline jurisdiction is available.

The SMP establishes a VCA for this reach that extends through the shoreline jurisdiction to the top of the marine bluff. The Lees Creek parcels all exist below the top of the bluff and are therefore the entire area in the shoreline jurisdiction is protected from significant removal of vegetation.

At this time, with the reach being within county jurisdiction, the City’s Comprehensive Plan and Environmentally Sensitive Areas Protection Ordinance do not apply.

**Zoning**

Much of this reach is in Clallam County and comes under their zoning designations at this time. Clallam County has applied the Open Space Overlay/Open Space corridor (OS). The purpose of the Urban Very Low Density/Open Space Overlay Zoning District and the Open Space Overlay...
Corridor is to identify areas which have development rights which may be transferred in order to further protect the critical areas or habitats identified by these overlay designations. Land uses, densities, lot sizes and setbacks are those allowed in the underlying zoning district. A development right in an Urban Very Low Density/Open Space Overlay Zoning District or an Open Space Overlay Corridor is established by the density of development allowed in the underlying zoning district. For example, every five acres of land in a Rural Low (R5) Zoning District within an Open Space Overlay Corridor has one development right. These development rights may be transferred as specified in Chapter 33.26 CCC.

Through an agreement with Clallam County, areas of the Eastern Urban Growth Area have been given a proposed City zoning that will be applied as areas are annexed into the city. The future city zone that will be applied to this area is Public Buildings and Parks.

**High-Intensity Urban Uplands (HI-UU)**

The purpose of the High-Intensity Urban Uplands (HI-UU) Environment is to manage uses on sites within 200 feet of the OHWM that are separated from the shoreline by a public right-of-way or public property and do not have direct access to the water.

The High-Intensity Urban Uplands Environment designation is assigned to shorelands featuring or planned for a variety of uses and within City jurisdiction that are **physically and functionally separated** from the shoreline by a public right-of-way or public property. Public streets are included in the HI-UU Environment.

**Valley Creek estuary (Segment K)**

This is an area south and east of the Valley Creek estuary and includes Marine Drive and Front Street rights-of-way adjacent to the estuary. The centerline of Valley Street is the western boundary of the HI-UU Environment, Segment K. The west edge of Cherry Street (extended north) is the eastern boundary of the HI-UU Environment, Segment K.

The area contains 5 parcels that are partially located within the shoreline jurisdiction. One parcel is vacant and is owned by the City. A second parcel is owned by the Port of Port Angeles and completely built out with a commercial office structure. One parcel is occupied by a mini mart/fuel station, and the remainder are owned and occupied by the local newspaper. All of the parcels are located on the southeast side of Marine Drive and have no contact with shoreline properties. No access to the shoreline is provided and the operation on the parcels have no impact on the shoreline. Marine Drive is located within a 70' right-of-way that provides additional separation of the shoreline from the commercial properties. Marine Drive, a portion of Front Street and First Street and the First/Front Alley are included in the HI-UU designation.

**Comprehensive Plan**

The area in Segment K is designated commercial.

**Zoning Ordinance**

The area is zoned Commercial Arterial (CA). This zone designation allows for a wide range of commercial uses. Building height is limited to 35'. Adverse impacts to the shoreline are not anticipated by potential redevelopment of the area.
Environmentally Sensitive Areas ordinance

No environmentally sensitive areas occur in this designation.

Francis Street Reach (Segment K)

This segment includes properties south of the Olympic Discovery/Waterfront Trail that are directly east of the downtown. These parcels include the Red Lion Motel site, along with the privately owned parcels to the east that contain a small pond/wetland.

Other parcels in this segment designated HI-UU are all located above the top of the marine bluff. This reach has parcel lines that closely mimic the top of bluff line. Therefore, these properties have no direct ownership waterward of the marine bluff. Although this is the case, the homes are all nonconforming with regard to the 50' marine bluff buffer. Several are nonconforming in regard to property line setbacks as well. One home actually hangs out over the bluff.

This reach also contains the Olympic Medical Center hospital.

Because of the proximity to the top of the bluff and the severely reduced bluff top buffer, impacts to the marine bluff may be increased. Small slides occur periodically in this reach. Because of the Olympic Discovery/Waterfront Trail being located at the toe of the bluff and being heavily armored, impacts from slides tend to be more adverse to the bluff top residences than to the marine shoreline.

Comprehensive Plan

Segment K is designated Open Space in the Comprehensive Plan. That designation extends to the top of the marine bluff. From the top of the bluff landward is located in an imprecise margin between the Open Space designation and a Commercial designation. A small section adjacent to the hospital is designated as commercial and extends from above the bluff to the shoreline.

Zoning

Zoning designations in this segment tend to follow the property lines (which generally follow the bluff line). The areas above the bluff line are zoned RS-7 and from the bluff top to the toe is Public Buildings and Parks. The hospital is also zoned Public Buildings and Parks. Waterward of the OHWM is zoned Industrial Heavy. In some areas, the Industrial Heavy zone extends upland to the base of the bluff.

The parcels abutting the east side of the Red Lion Motel property are zoned Industrial Light.

Environmentally Sensitive Areas ordinance

The marine bluff is designated as an environmentally sensitive area. No existing structure in this reach is in conformance with the required 50' buffer. All of the residential parcels above the bluff top in this reach are fully developed. As redevelopment proposals are received, some enhancement to the buffer may be gained.

The parcels abutting the east side of the Red Lion Motel property contains a pond/wetland that has not been delineated at this point, but is likely to be delineated as a Category III wetland would be regulated by PAMC 15.24. A 75' buffer would be required. The parcels are also impacted by the required 50' marine bluff buffer.