ATTACHMENT B: ECOLOGY RECOMMENDED CHANGE TO THE CITY OF CAMAS, SHORELINE MASTER PROGRAM PERIODIC REVIEW AMENDMENT Changes in blue are recommended and are consistent with SMA policy (RCW 90.58.020) and the SMP Guidelines (WAC 173-26, Part III)

ITEM	SMP Provision	BILL FORMAT CHANGES [underline-additions; strikethrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
1	5.3 Critical Areas Protection	3. CMC Chapter 16.57 Frequently Flooded Areas applies within shoreline jurisdiction but is not incorporated as specific regulations of this SMP.	Recommended change: Add this sentence and do not incorporate flood hazard regulations into the SMP. We recommend that the SMP contain a soft reference to its flood hazard regulations and that this code be implemented separately from the SMP. Flood hazard regulations are not necessary for consistency with RCW 90.58 or the SMP guidelines. The SMP would remain consistent with the requirements of WAC 173-26-221(3) through implementation of 3.6 Flood Prevention and Flood Damage Minimization and 5.4 Flood Prevention and Flood Damage Minimization. The purpose of the CMC Chapter 16.57 regulations is for National Flood Insurance Program (NFIP) certification, not the SMA. These regulations, by-and-large, are building codes. By incorporating these regulations into the SMP, any applicant that needs to deviate from these would need to apply for a shoreline variance, which could be hard to obtain. Making this revision: • Ensures the City's NFIP required flood ordinance will apply citywide; • Removes the challenge of coordinating amendments to the SMP every time the flood code needs revision as may be required by the NFIP; and • Eliminates unnecessary SMA permitting and process steps that could impact the City's ability to maintain its certification under the NFIP.
2	5.4 Flood Prevention and Flood Damage Minimization	4. The areas of special flood hazard identified by the Federal Insurance Administration in a scientific and engineering report entitled "The Flood Insurance Study for Clark County, Washington, and incorporated areas" dated September 5, 2012, and any revisions thereto, with accompanying Flood Insurance Rate Maps (FIRM). The study is the official report provided by the Federal Insurance Administration that includes flood profiles, the Flood Insurance Rate Maps, and the water surface elevation of the base flood. The study and FIRM are on file at the City of Camas [616 NE 4th Avenue, Camas WA] and the City website [www.cityofcamas.us] . The best available information for flood hazard area identification as	Recommended change, removing reference to Appendix C and updating the citation. See rationale above.

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Changes in blue are recommended and are consistent with SMA policy (RCW 90.58.020) and the SMP Guidelines (WAC 173-26, Part III)

	outlined in Appendix C, Section 16.57.050(CI) shall be the basis for regulation until a new FIRM is issued that incorporates data utilized. In addition, Map 27 Potential Channel Migration Zone (CMZ) Areas (Inventory and Characterization Report Volume 1, Lewis and Salmon-Washougal is hereby incorporated by reference.	
Appendix C - Chapter 16.57 – 3 Frequently Flooded Areas	Chapter 16.57 – Frequently Flooded Areas CMC Chapter 16.57 applies within shoreline jurisdiction but is not incorporated as specific regulations of this SMP. Strike the remainder of Chapter 16.57 from Appendix C.	Recommended change. See rationale above.