Clallam County Shoreline Master Program:

In effect for Over 40 years, with nine revisions.
Authority

• Shoreline Management Act (RCW 90.58)

• Shoreline Master Programs Guidelines (WAC 173-26)

• Shoreline Management Permit and Enforcement Procedures (WAC 173-27)
Shoreline Management Act Goals

- Encourage water-dependent & priority uses
- Protect natural resources
- Promote public access
Increase protection of lives and property from flood, channel migration, landslide damage, and other environmental hazards.
Steps to updating an SMP

1. Develop Community Vision  - Completed 2011
2. Prepare Consistency Review  - Completed 2011
3. Inventory Shoreline Conditions  - Completed 2012
4. Assign Environment Designation  - 2013-14
5. Prepare Restoration Plan  - Updated 2016
7. Assess Cumulative Impacts  - June 2017

SEPA Environmental Review (October 2017)
Draft SMP (Sept. 2017) Contents:

Chap. 1: Introduction and Overview (e.g., Vision, Goals, Jurisdiction)
Chap. 2: Shoreline Environmental Designations (SED)
Chap. 3: Policies & Regulations for Specific Shoreline Uses & Development
Chap. 4: Policies & Regulations for Shoreline Modifications
Chap. 5: General Policies & Regulations
Chap. 6: Shoreline Buffers & Vegetation Conservation
Chap. 7: Critical Areas within Shoreline Jurisdiction
Chap. 8: Mitigation and No Net Loss
Chap. 9: Shorelines of Statewide Significance
Chap. 10: Administrative Procedures
Chap. 11: Definitions
Exhibit A: Shoreline Environmental Designation (SED) Maps
Exhibit B: Shoreline Permit Checklist
Shoreline Master Program applies to:

All 39 counties and more than 200 cities that have "shorelines of the state"

Shorelines of the state include:

• All marine waters;
• Streams greater than 20 cubic feet per second mean annual flow;
• Lakes 20 acres or larger;
• Adjacent shorelands
Shorelands include:

• Lands within 200 feet of ordinary high water mark or floodway (where mapped), whichever greater.
• Associated Wetlands (e.g. wetlands in floodplain)
• River Deltas
• Up to the full extent of the 100-year floodplain (*propose all*)
• Critical area buffers**

*All lands necessary for buffers to protect critical areas (e.g., wetlands, landslide hazard areas, other non-SMP streams) that are overlapping or otherwise coincident with shoreline jurisdiction.
Area covered by Clallam Co. SMP

- Approximately 4.5% of County subject to Draft SMP
- Most marine areas to County/State jurisdictional line
- Port Angeles and Sequim have own SMP.
- Forks will consider adopting County SMP.
- National Park and Tribal Reservation/ Trust lands are excluded
General Map Showing Approximate Shoreline Jurisdiction (*Does not show extent into marine waters*)
Chapter 2- Shoreline Environmental Designations (SEDs)
What are Shoreline Environment Designations (SEDs)?

• **Purpose:** To provide a framework for tailoring policies and regulations to different shoreline segments based on their characteristics.

• **Mapping:** Each shoreline segment has a mapped SED based on classification criteria.
Assigning Designations

- Vegetation & habitat
- Lot size & shape
- Shoreline modifications
- Hazards
- Future development potential
- Risk that development will affect functions

Shoreline Environment Designation

Existing land use
Shoreline Environmental Designations (SEDs)

Existing Designations
- Natural
- Conservancy
- Rural
- Suburban
- Urban

Proposed Designations
- Aquatic
- Natural
- Resource Conservancy
- Shoreline Residential -- Conservancy
- Shoreline Residential -- Intensive
- Marine Waterfront
Proposed Shoreline Environment Designations (SED) and Maps

- Aquatic
- Natural (~ 8%)
- Resource Conservancy (~ 65%)
- Shoreline Residential – Conservancy (~ 23%)
- Shoreline Residential – Intensive (~ 3%)
- Marine Waterfront (~ 1%)
Application of SEDs

• SMP Regulations Based on Assigned SED:
  – Permitted, Conditional and Prohibited Uses and Developments
  – Shoreline buffers
  – Other standards

• Zoning and other applicable regulations that overlap shoreline jurisdiction still apply.
SMP Chapters 3 and 4

Chap 3: Policies & Regulations for Specific Uses & Developments

- Agriculture
- Aquaculture
- Commercial & Industrial Development
- Forest Practices (Conversions)
- Mining
- Parking
- Recreation
- Residential
- Restoration
- Signs
- Transportation
- Utilities

Chap 4: Policies & Regulations for Shoreline Modifications

- Beach Access Structures
- Boating Facilities & Moorage (marinas; boat launches; piers/docks, etc.)
- Dredging and Dredge Material Disposal
- Flood Hazard Management and Flood Control Structures
- In-Stream and In-Water Structures
- Shoreline Stabilization (e.g., bulkheads)
# SED Use Tables: Permitted (P), Conditional (C) and Prohibited (X)

- See SMP Section 2.9 for Other Uses
- Shoreline uses must also be permitted uses under the Clallam County Zoning Code, Title 33 CCC

<table>
<thead>
<tr>
<th>Use/Development/Modification</th>
<th>Aquatic-Straits</th>
<th>Aquatic-Pacific Ocean</th>
<th>Marine Waterfront</th>
<th>Shoreline Residential - Intensive</th>
<th>Shoreline Residential - Conservancy</th>
<th>Resource Conservancy</th>
<th>Natural</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residential Use/Development (see Section 3.8)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single-family Residences</td>
<td>X</td>
<td>X</td>
<td>P²</td>
<td>P²</td>
<td>P²</td>
<td>P²</td>
<td>C</td>
</tr>
<tr>
<td>Overwater Residences</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Floating Homes</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Multi-family Residences</td>
<td>X</td>
<td>X</td>
<td>C</td>
<td>C</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Accessory Dwelling Units</td>
<td>X</td>
<td>X</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P/X⁴</td>
<td>X</td>
</tr>
<tr>
<td>Land Division / Subdivision</td>
<td>X</td>
<td>X</td>
<td>P³</td>
<td>P³</td>
<td>P³</td>
<td>C³</td>
<td>X</td>
</tr>
</tbody>
</table>

Superscript notes:
- P²: Permitted
- P/X⁴: Prohibited with X² exception
- C³: Conditional with X³ exception

Footnotes:
1. Aquatic-Strait (marine) and Aquatic-Pacific Ocean (shoreline) uses are subject to the Clallam County Zoning Code, Title 33 CCC.
Chapter 5 – General Policies & Regulations

• Existing (Grandfathered) Uses & Developments
• Clearing, Grading and Filling
• Public Access
• Water Quality and Water Management
• Archaeological, Historical, and Cultural Resources
Existing developments are not affected unless:

• New clearing or grading
• Expansion of the structure
• New/replacement structures
• Redevelopment
Existing and Grandfathered Uses (SMP Section 5.1)

• All lawfully established uses may continue and may be repaired, maintained, expanded or modified consistent with the SMP.

• May be rebuilt after damage (e.g., fire):
  – Sites in hazardous areas may require geotechnical evaluation
  – Sites in the floodplain subject to National Flood Insurance Program Requirements

• Allowance of administrative approval of minor expansions (up to 400 sq. ft.) of existing, single-family homes located in shoreline buffers that meet approval criteria.
  – Other expansions subject to either a conditional use permit or variance approval.
Shoreline Buffers & Vegetation Conservation

SMP Chapter 6
## SED Proposed Shoreline Buffer Widths: Minor & Major New Development

<table>
<thead>
<tr>
<th>Shoreline Environment Designation</th>
<th>Standard Shoreline Buffer Width (feet) based Upon Type of Development and Lot Dimension (Measured from the ordinary high water mark—OHWM)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Minor New Development on existing lots with &lt; 200 ft. of depth from OHWM to rear lot line</td>
<td>Minor New Development on existing lots with ≥ 200 ft. of depth from OHWM to rear lot line</td>
</tr>
<tr>
<td>Marine Waterfront</td>
<td>50 feet</td>
<td>75 feet</td>
</tr>
<tr>
<td>Shoreline Residential - Intensive</td>
<td>50 feet</td>
<td>75 feet</td>
</tr>
<tr>
<td>Shoreline Residential - Conservancy</td>
<td>100 feet</td>
<td>125 feet</td>
</tr>
<tr>
<td>Resource Conservancy</td>
<td>150 feet</td>
<td>150 feet</td>
</tr>
<tr>
<td>Natural</td>
<td>175 feet</td>
<td>175 feet</td>
</tr>
</tbody>
</table>

**Overlapping Buffers:** In the event that buffers for any shorelines and/or critical areas are contiguous or overlapping, the landward-most edge of all such buffers shall apply.

**Lake Sutherland Buffer:** Minor new development buffer is 35 feet landward of the OHWM regardless of lot depth.
Minor New Development – Existing Lot

Minor New Development (Existing Lots*):

- Single-family residential
- Low intensity, water-dependent recreational use/development

(*Unless part of an existing subdivision subject to larger buffers)

AND

- Meets **ALL** of the following criteria:
  - **Clearing/land disturbance:** Lesser of 15% of parcel area or 20,000 sq. ft. (minimum of 2,500 sq. ft. allowed);
  - **Impervious area (including structures):** Lesser of 5% of parcel area or 6,500 sq. ft. (minimum of 2,000 sq. ft. allowed);
  - **Cumulative Structure Footprint:** < 4,000 sq. ft.; and
  - **Buffer Condition:** Meets (or restored to) the plant density and cover standards (see SMP Section 6.3.4).
Major New Development

- Any new development that does not qualify as minor new development. Examples:
  - Most new commercial development
  - Single-family that does not meet “minor new development” criteria

- New divisions of land (i.e., lot creation):
  - Why?: Creating new lots for development intensifies development pressures along the shoreline
Standard Shoreline Buffer Width: *Minor New Development (most single-family) on Existing Lots*

<table>
<thead>
<tr>
<th>Current</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Natural = 150 ft.</td>
<td>• Natural = 175 ft.</td>
</tr>
<tr>
<td>• Conservancy = 75 ft.</td>
<td>• Resource Conservancy = 150 ft.</td>
</tr>
<tr>
<td>• Rural = 50 ft.</td>
<td>• Residential-Conservancy = 100 or 125 ft. *</td>
</tr>
<tr>
<td>• Suburban/Urban = 35 ft.</td>
<td>• Residential-Intensive = 50 or 75 ft. *</td>
</tr>
<tr>
<td></td>
<td>– 35 ft. for Lake Sutherland</td>
</tr>
<tr>
<td></td>
<td>• Marine Waterfront = 50 or 75 ft.</td>
</tr>
</tbody>
</table>

*Based on lot depth, larger buffer for existing lots with ≥ 200 ft. of depth.

Measured from the Ordinary High Water Mark (OHWM)
Standard Shoreline Buffer Width: Major New Development on Existing Lots

**Current**
- Natural = 150 ft.
  - Duplex/Multi-family = 200 ft.
- Conservancy = 150 ft.
  - Duplex/Multi-family = 200 ft.
- Rural = 150 ft.
- Suburban/Urban = 150 ft.

**Proposed**
- Natural = 175 ft.
- Resource Conservancy = 150 ft.
- Residential-Conservancy = 150 ft.
- Residential-Intensive = 100 ft.
- Marine Waterfront = 100 ft.

*Measured from the Ordinary High Water Mark (OHWM)*
Standard Shoreline Buffer Width:
New Land Divisions (i.e., create new lots)

<table>
<thead>
<tr>
<th>Current</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Natural = <em>Prohibited</em></td>
<td>• Natural = 175 ft.</td>
</tr>
<tr>
<td>• Conservancy = <em>Prohibited</em></td>
<td>• Resource Conservancy = 150 ft.</td>
</tr>
<tr>
<td>• Rural = 150 ft.</td>
<td>• Residential-Conservancy = 150 ft.</td>
</tr>
<tr>
<td>• Suburban/Urban = 150 ft.</td>
<td>• Residential-Intensive = 100 ft.</td>
</tr>
<tr>
<td></td>
<td>• Marine Waterfront = 100 ft.</td>
</tr>
</tbody>
</table>

*No new lot creation within 200 ft. of OHWM.*

Measured from the Ordinary High Water Mark (OHWM)
Chap. 6–Shoreline Buffers & Vegetation Conservation

• **Shoreline Buffer Clearing**
  – Retain at least 80% well-vegetated area
  – 20% of buffer for active use (lawn, pathways)
  – Clearing for views and access
  – Hazard tree removal
  – Invasive Species Management
  – Private pathways

• **Developments Allowed in Buffer (Subject to Mitigation)**
  – Water Dependent and Related Uses
  – Pedestrian beach access structures
  – Public trails and public access improvements
  – Certain utilities and public facilities

• **Reductions of Standard Shoreline Buffer Widths**
  – Allowances for Buffer Averaging
  – Exceptions for Buffers Interrupted by Roads & Intervening Developed Lots
  – Variances
Existing Vegetation (SMP Section 5.14)

• Proposed new SMP buffers do not apply retroactively, except where required mitigation for new and expanded uses and development. ¹(see note below)

• Existing views may be maintained.

• Existing areas of residential landscaping, lawns and gardens, may be maintained, but not expanded.

• Non-destructive limbing and/or pruning allowed:

• New land clearing and grading subject to compliance with the shoreline and critical area buffer regulations in Chapters 6 and 7 of the SMP.

¹Note: Vegetation removal and land clearing along shorelines, critical areas (e.g., wetlands, landslide hazards) and associated buffers is subject to compliance with the current County SMP and Critical Areas Code.
Chapter 7 – Critical Areas within Shoreline Jurisdiction

- Includes classification/designation criteria, policies, and regulations (e.g., buffers) for Critical Areas:
  - Wetlands
  - Aquatic Habitat Conservation Areas (e.g., other non-SMP streams)
  - Terrestrial Habitat Conservation Areas
  - Geologically Hazardous Areas
  - Frequently Flooded Areas
  - Critical Aquifer Recharge Areas

- Critical areas within the SMP jurisdiction are to be regulated under the SMP.
## Proposed Critical Area Buffers in SMP Jurisdiction

<table>
<thead>
<tr>
<th>Critical Area</th>
<th>Standard Buffer Width (feet)</th>
<th>Related SMP Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetlands</td>
<td>25 to 300 (depending on wetland category and characteristics)</td>
<td>Sections 7.4-7.6</td>
</tr>
<tr>
<td>Other streams in shoreline jurisdiction</td>
<td>50 to 100 feet (depending on water type)</td>
<td>Section 7.7-7.9</td>
</tr>
<tr>
<td>Terrestrial Habitat Conservation Areas</td>
<td>Per Habitat Management Plan (if required)²</td>
<td>Sections 7.10-7.11</td>
</tr>
<tr>
<td>Landslide Hazard Area</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Marine Bluff—Feeder Bluff Exception</td>
<td>150 feet</td>
<td>Section 7.12-7.14</td>
</tr>
<tr>
<td>- Marine Bluff—Feeder Bluff or Feeder Bluff Talus</td>
<td>100 feet</td>
<td>Section 7.12-7.14</td>
</tr>
<tr>
<td>- Other Landslide Hazard Area</td>
<td>50 feet</td>
<td>Section 7.12-7.14</td>
</tr>
<tr>
<td>- Channel Migration Zone (CMZ)</td>
<td>Based on CMZ Assessment (no buffer if locate outside of mapped potential CMZ)</td>
<td>Section 7.12-7.14</td>
</tr>
</tbody>
</table>

Proposed SMP jurisdiction extends to all lands necessary for buffers to protect critical areas that are overlapping or otherwise coincident with the shoreline jurisdiction. [RCW 90.58.030(2)(d)(ii)]
Morse Creek
Morse Creek
(South of US 101)

Olympic National Park
Marine Bluffs
(West of Morse Creek to Bluffs Subdivision)
Shoreline Residential - Conservancy

The Bluffs Subdivision Area
Shoreline Residential - Conservancy

Gasman Rd Area (East of Bluff’s Subdivision)
Port Angeles Eastern Urban Growth Area (UGA)

Unstable Bluff

Between Port Angeles & Morse Creek
East Port Angeles UGA (between Lees & Morse Creeks)
Port Angeles to Angeles Pt. (Coastal Areas)
Port Angeles Transfer Facility

Shoreline Residential - Conservancy

West of Dry Creek (N. Breakerpoint Pl.)
Before & After 2017 Armor Removal (East of Angeles Pt.)
Source: Coastal Watershed Institute
2017 Armor Removal (Before & After)

Looking East

Looking West
Elwha River

Natural

Natural
Elwha River and Little River
Freshwater Bay – Place Rd
Shoreline Residential - Intensive
Shoreline Residential - Conservancy

Freshwater Bay (West of Place Rd)
Freshwater Bay - West
West Freshwater Bay Shoreline (East of County Park)
Freshwater Bay County Park to Salt Creek (Coastal Areas)
Freshwater Bay

Shoreline Residential - Conservancy

Observatory Pt. (West of Freshwater Bay County Park)
Salt Creek & Crescent Bay Areas

Environmental Designations
- Natural
- Resource Conservancy
- Shoreline Residential-Conservancy
- Shoreline Residential-Intensive
- Aquatic
Shoreline Res. - Conservancy

Salt Creek – Crescent Beach Rd.
Shoreline Res. – Intensive

Resource Conservancy

West-Side of Crescent Bay
Salt Creek
(South of Salt Creek Recreation Area)
Crescent Bay to Lyre River (Coastal Areas)

Environmental Designations

- Natural
- Resource Conservancy
- Shoreline Residential-Conservancy
- Shoreline Residential-Intensive
- Aquatic
Resource Conservancy

Between Agate Bay & Whiskey Creek
Whiskey Creek Area
Environmental Designations

- Natural
- Resource Conservancy
- Shoreline Residential-Conservancy
- Shoreline Residential-Intensive
- Aquatic
Lake Sutherland

Environmental Designations

- Natural
- Resource Conservancy
- Shoreline Residential-Conservancy
- Shoreline Residential-Intensive
- Aquatic

Lake Sutherland Park
Indian Creek

Environmental Designations

- Natural
- Resource Conservancy
- Shoreline Residential-Conservancy
- Shoreline Residential-Intensive
- Aquatic
Channel Migration Zone (CMZ)

**Definition:** Areas along a river or stream within which the channel can reasonably be expected to migrate over time as a result of normally occurring hydrological and related processes when considered with the characteristics of the river and its surroundings.

**Excludes:** Areas protected from channel movement due to:
- Permanent levees, or
- Infrastructure improvements such as roads and bridges constructed and maintained by public agencies.

**Source:** Draft Channel Migration Assessment – Clallam County, by Wa. Dept. of Ecology and GeoEngineers (April 2013).

**Aerial Photo Date:** 2010
State CMZ Mapping & Methodology

DRAFT Channel Migration Assessment
Clallam County
December 2011
State CMZ Mapping for Clallam County

- Relies on existing data (e.g., geology, soils, topography, aerial photos) to identify the “general” CMZ location.
  - Includes erosion hazard factor based on ½ to 1 width of the active channel corridor and adjusted to local conditions.
    - Active channel generally corresponds to the meander belt of the active channel (unvegetated area) and has a width approximately the meander amplitude of the river reach.

- Ecology’s CMZ maps:
  - Do not include field verification.
  - Not based on risk probability (except mouth of Morse Creek)
  - Do not substitute for more detailed or site specific CMZ investigations.
Channel Migration Zone (CMZ)

Current Critical Areas Code

- **Buffer:** 50 ft. from edge of CMZ.
  - CMZ edge generally determined by site specific professional report

Proposed SMP

- **Locate Inside CMZ:**
  - Must submit a CMZ study that demonstrates proposed use/development site has minimal risk.

- **Buffer:**
  - Based on results of CMZ study.
  - Ecology CMZ maps already include erosion hazard buffers.
Chapter 8 – Mitigation and No Net Loss (NNL)

- Mitigation includes following actions (in order of priority):
  - Avoiding the impact
  - Minimizing the impact
  - Rectifying the impact (e.g., restore affected environment)
  - Reducing or eliminating the impact over time
  - Compensating for impact by replacing, enhancing, or providing substitute resources or environments
  - Monitoring the impact of compensation projects and taking appropriate corrective actions.
What is No Net Loss (NNL)?

As shoreline development occurs, ecological functions stay the same (or are improved) over time.
No Net Loss (NNL)

- Overall SMP policies and regulations (e.g., buffers) are designed to achieve no net loss on a programmatic scale.

- SMP standards focus on actions that each development must meet to achieve no net loss at the project scale.

- County to track environmental indicators of NNL over time.
NNL Environmental Indicators

- Percent of mapped feeder bluffs with armoring (percent classified as modified);
- Status of salmon stocks;
- Status of shellfish beds (frequency of closures);
- Length of stream bordered by/confined by levees, excluding setback levees;
- Number of overwater structures per mile of shore and number of overwater structures per mile of sediment transport zone;
- Number of tidal barriers;
- Percent of aquatic area supporting submerged aquatic vegetation (e.g., kelp, eelgrass);
- Percent closed canopy forest within two hundred (200) feet of the ordinary high water mark;
- Percent impervious surface within two hundred (200) feet of the ordinary high water mark; and
- Area of undeveloped floodplains/channel migration zone.
Chapter 9–Shorelines of Statewide Significance

• Shorelines of statewide as well as local interest:
  – Strait of Juan de Fuca (to Canadian line, including bay, inlets, etc…)
  – Pacific Ocean (including bays, inlets, etc.) to state boundary
  – Quillayute River
  – Portions of the Bogacheil, Calawah, Elwha, and Sol Duc Rivers

• SMP must consider additional policies and use preferences.
Chapters 10 and 11

- Chap. 10 Administrative Procedures
  - Incorporates permit provisions, review and application process, compliance/enforcement, amendment process, and other administrative procedures in the proposed SMP.

  - Most of these provisions are currently addressed outside of the existing SMP under Title 35, Shorelines, of the County Code.

- Chap. 11 Definitions
  - Terms defined in Chapter 11 will be used to administer SMP versus other definitions.
NEXT STEPS
Upcoming Public Meetings

• Final Regional Forum is November 14 in Sequim at John Wayne Marina at 6:00 pm.

• County Commissioner Work Sessions on Draft SMP:
  - October 30, 2017
  - November 13, 2017
  - November 27, 2017
  - December 4, 2017

Work sessions begin at 9 a.m. Agendas posted Thursday evening prior to the meeting. Work sessions can now be viewed “live” online on the Internet.
Board of County Commissioners (BOCC) – Local Adoption

• BOCC to hold public hearing on the Draft SMP (Sept. 2017) on December 12, 2017 at 10:30 a.m. in the County Courthouse (Room 160).
  – Consider oral and written comments received
  – Prepare a summary responding to comments received during the public hearing and comment period.
  – Adopt or revise proposed SMP. May also remand back to Planning Commission for further work on specific issues.

• Timeline for Local Adoption: Likely winter/spring 2018
How to Comment:

Submit written comments in advance of the December 12, 2017 public hearing or present written and/or oral comments in person during the hearing.

Send written comments to:

**By email:** SMP@co.clallam.wa.us

**By mail:** Clallam County Board of Commissioners RE: Shoreline Master Program Update 223 East Fourth Street, Suite 4 Port Angeles, WA 98362-3015
Ecology will:

- Notify public of County adopted SMP.
- Hold a minimum 30-day public comment period, and may hold one or more public hearings in the County.
- Send comments received to County for response.
- Within 30-days of receiving County response to comments, Ecology must make findings/conclusions on the SMP consistency with the Shoreline Management Act (RCW 90.58) and state SMP Guidelines (WAC 173-26).
For More Information:

• Go Clallam County Shoreline Management Update Home Page:

http://www.clallam.net/LandUse/SMP.html
QUESTIONS?