

The following changes are recommended, to clarify provisions of the SMP, and are consistent with the SMA (RCW 90.58) and the SMP Guidelines (WAC 173-26, Part III)

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
1	<p>1.06.02 C Policies for Shorelines of Statewide Significance Pages 6-7</p>	<p>C. Policies for Shorelines of Statewide Significance The statewide interest should be recognized and protected over the local interest in Shorelines of Statewide Significance. To ensure that statewide interests are protected over local interests, the County shall review all development proposals within Shorelines of Statewide Significance for consistency with RCW 90.58.030 and the following policies:</p> <ol style="list-style-type: none"> 1. Encourage redevelopment of shorelines where it restores or enhances shoreline ecological functions and processes impaired by prior development activities. 2. The County should consult with Ecology, the Washington State Department of Fish and Wildlife (WDFW), and the Confederated Tribes of the Chehalis Reservation, the Quinalt Indian Nation, the Cowlitz Indian Tribe, the Nisqually Indian Tribe, and other resources agencies for development proposals that could affect anadromous fisheries. 3. <u>The County should consult WDNR on all proposals on state-owned aquatic lands.</u> 4. Where commercial timber cutting takes place pursuant to SMP Section 5.09 and RCW 90.58.150, reforestation should take place as soon as feasible. 5. ... 	<p>In response to a comment from Department of Natural Resources the County has suggested an additional policy.</p>
2	<p>3.01.03 C Natural Page 16¹</p>	<p>C. Management Policies 5. Forest practices may be allowed as a conditional use in the Natural shoreline environment designation if it meets the conditions and implementing rules of the Washington State Forest Practices Act (FPA) and it is conducted in a manner consistent with the purpose of this shoreline environment designation.</p>	<p>County request to delete policy. The standard is reflected in Table 5-1 and Forest Practices are addressed in 5.09.</p>
3	<p>3.02.02 B Determining Shoreline Environment Designation Boundaries Pages 19-20</p>	<p><u>B. Any area that is within shoreline jurisdiction, as shown on the Shoreline Environment Designation Maps, but which does not meet the criteria for shoreline jurisdiction shall not be subject to the requirements of the County's SMP. The County shall rely on the criteria contained in RCW 90.58.030(2) and WAC 173-22, as amended, to determine shoreline jurisdiction. Map revisions shall require an SMP amendment consistent with SMP Section 7.09.</u></p> <p>BC. In the event of a shoreline environment designation mapping error, the Shoreline Administrator shall utilize the common boundary criteria contained in SMP Section 3.02.02(A) to establish the appropriate shoreline environment designation through the SMP amendment process found in SMP Section 7.09. Corrections to the boundaries of shoreline environment designations on SMP maps must be consistent with the requirements in SMP Section 3.02.02(A) and shall require an SMP amendment consistent with SMP Section 7.09.</p> <p>CD. ...</p>	<p>Recommended revisions consistent with WAC 173-18-046 and WAC 173-20-046 and WAC 173-26-211(2)(b).</p>
4	<p>4.02.02 A Archaeological and Historic Resources Page 22</p>	<p>A. Permits issued in areas documented to contain archaeological resources shall require a site inspection or evaluation by a professional archaeologist in coordination with affected tribes and DAHP prior to <u>any ground disturbance</u>permit issuance. Failure to complete a site survey shall be considered a violation of the shoreline permit.</p>	<p>Suggested revision.</p>

¹ Page numbers are based on the hardcopy and pdf versions of the master program.

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE																											
5	4.03.01 Environmental Impacts and Mitigation Page 23	<p>Policies</p> <p>A. Avoid or mitigate impacts in shoreline jurisdiction to ensure the standards of no net loss to ecological function are met.</p> <p>B. <u>Proposals to impact and/or conduct mitigation actions on state-owned aquatic lands should be reviewed by WDNR to ensure project feasibility.</u></p>	In response to a comment from Department of Natural Resources the County has suggested an additional policy.																											
6	4.04.01 F Critical Areas and Shoreline Vegetation Conservation Page 25	F Replant cleared and disturbed sites promptly after completion of any clearance or construction. <u>Use with</u> native vegetation in those locations where there was previously native vegetation, or with native or other species in those areas previously vegetated with non-native or ornamental species.	County suggested edits to improved clarity.																											
7	4.04.02 A Critical Areas Ordinance Adopted and Modified Page 28	<p>A. Critical Areas Ordinance Adopted and Modified</p> <p>...</p> <p>5....</p> <p>i. LCC 17.35A.610 – Wetland Protection. The Washington State Wetland Rating System was updated in 2014. The following clarifications apply in shoreline jurisdiction:</p> <p>...</p> <p><u>4) The following tables convert the 2004 wetland category and function scoring to the 2014 rating system:</u></p> <p>a. <u>Table for converting category scores:</u></p> <table border="1" data-bbox="497 846 1303 1138"> <thead> <tr> <th><u>2004</u></th> <th><u>Western WA</u></th> <th><u>2014</u></th> </tr> </thead> <tbody> <tr> <td><u>> 70</u></td> <td><u>Category I</u></td> <td><u>23-27</u></td> </tr> <tr> <td><u>51-69</u></td> <td><u>Category II</u></td> <td><u>20-22</u></td> </tr> <tr> <td><u>30-50</u></td> <td><u>Category III</u></td> <td><u>16-19</u></td> </tr> <tr> <td><u><30</u></td> <td><u>Category IV</u></td> <td><u>9-15</u></td> </tr> </tbody> </table> <p>b. <u>Table for converting function scores:</u></p> <table border="1" data-bbox="497 1235 1303 1471"> <thead> <tr> <th><u>2004</u></th> <th><u>Final Habitat Score</u></th> <th><u>2014</u></th> </tr> </thead> <tbody> <tr> <td><u>29-36</u></td> <td><u>High</u></td> <td><u>8-9</u></td> </tr> <tr> <td><u>20-28</u></td> <td><u>Medium</u></td> <td><u>5-7</u></td> </tr> <tr> <td><u>< 19</u></td> <td><u>Low</u></td> <td><u>3-4</u></td> </tr> </tbody> </table>	<u>2004</u>	<u>Western WA</u>	<u>2014</u>	<u>> 70</u>	<u>Category I</u>	<u>23-27</u>	<u>51-69</u>	<u>Category II</u>	<u>20-22</u>	<u>30-50</u>	<u>Category III</u>	<u>16-19</u>	<u><30</u>	<u>Category IV</u>	<u>9-15</u>	<u>2004</u>	<u>Final Habitat Score</u>	<u>2014</u>	<u>29-36</u>	<u>High</u>	<u>8-9</u>	<u>20-28</u>	<u>Medium</u>	<u>5-7</u>	<u>< 19</u>	<u>Low</u>	<u>3-4</u>	As noted in the first paragraph, the Wetland Rating System was updated and is considered the “most current, accurate, and complete scientific and technical information” (WAC 173-26-201(2)(a)). Use of this system is required for any proposals requiring permits from state and federal agencies. Incorporating this now is recommended, consistent with WAC 173-26-201(2)(c)(i)(B)
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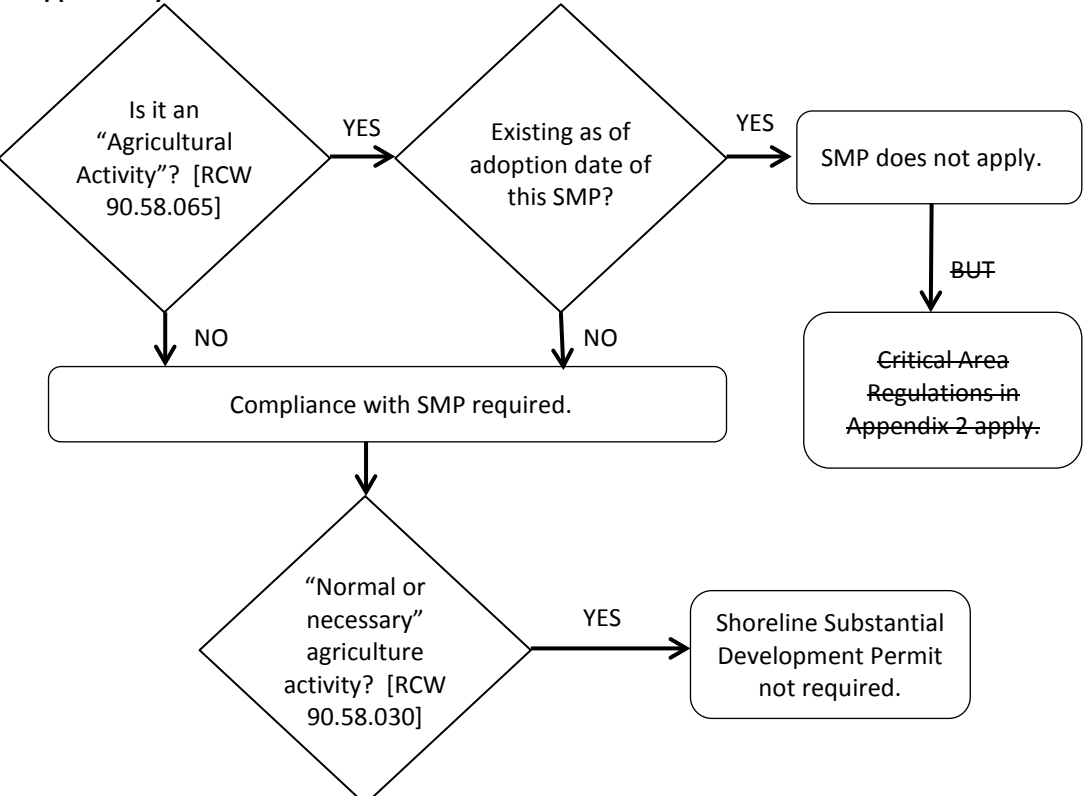
ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
		<p>...</p> <p>n. LCC 17.35A.680 – Protection. The provisions for single-family development on parcels of five acres or greater adjacent to Type S waters in LCC 17.35A.680(2) do not apply in shoreline jurisdiction. In shoreline jurisdiction, the standard buffer width requirements found in SMP Table 4-1: Shoreline Buffers based on LCC 17.35A.680(1) shall apply.</p> <p>...</p> <p>q. LCC 17.35A.956 – Development standards for channel migration hazard areas. In shoreline jurisdiction, uses and activities that may be authorized in CMZs are listed in SMP Section 4.05.02(H)(F).</p> <p>r. LCC 15.35.310 – Floodways. Within shoreline jurisdiction, uses and activities that may be authorized within floodways or the SMP flood course are listed in SMP Section 4.05.02(H)(F).</p>	<p>Citation corrections.</p> <p>Corrections in q. and r. reflect the incorporation of proposed revisions in Recommended change #13.</p>
8	<p>4.04.02 B Critical Areas and Shoreline Vegetation Conservation Pages 28- 29</p>	<p>B. Shoreline Buffer Tables</p> <p>...</p> <p>8. Subcategories for types of uses or activities include the following terms:</p> <p>a. <u>Water dependent</u> means a use that cannot exist in any other location and is dependent on the water due to the intrinsic nature of its operations, such as a port or sewer outfall.</p> <p>b. <u>Water related</u> means a use that is not intrinsically dependent on a waterfront location but whose economic viability is dependent upon a waterfront location, such as a fish processing plant or a sewer treatment plant.</p> <p>c. <u>Water enjoyment</u> means a recreational use or other use that facilitates public access to the shoreline as a primary characteristic of the use. Examples include public trails, golf courses, parks, etc.</p> <p>d. <u>Non-water oriented</u> means everything else: an auto parts store, etc.</p>	<p>Minor typographical correction.</p> <p>Recommended deletion to remove redundant language. These definitions are defined in Chapter 8, Definitions.</p>
9	<p>4.04.02 B Shoreline Buffers Table 4-1 and Notes Pages 31-32</p>	<p>See Exhibit 1 to Attachment C for changes to Table 4-1 and the notes.</p>	
10	<p>4.04.02 D Critical Areas and Shoreline Vegetation Conservation Page 36</p>	<p>D. General buffer regulations</p> <p>...</p> <p><u>2. Critical Areas Buffers</u></p> <p>The uses and activities allowed within critical areas buffers in LCC Chapter 17.35A, including the uses permitted in wetland buffers per LCC 17.35A.600 as modified in 4.04.02(A)(5)(h), and riparian buffers for shorelines waters that are not shorelines of the state per LCC 17.35A.670, may be allowed without a shoreline variance, when located, constructed, and maintained in a manner that minimizes adverse impacts on shoreline ecological functions, and in compliance with the SMP.</p>	<p>Suggested edits to improve internal consistency and clarity. Proposed use of “waters” to describe non-shoreline waters is consistent with the language in LCC 17.35A.670. See also 4.04.02(A)(5)(m) and 4.04.02(B)(3) which describe the application of stream typing and critical area buffers for non-shoreline waters.</p>
11	<p>4.04.02 F</p>	<p>F. Revegetation</p>	<p>Typographical correction.</p>

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	Critical Areas and Shoreline Vegetation Conservation Page 38	1. Surfaces that are cleared of vegetation in shoreline or critical area buffers, aside from normal maintenance described in SMP Section 4.04.02(E)(6), and are not developed must be replanted within one year. Replanted areas shall be planned <u>planted</u> and maintained such that within three years the vegetation cover is at least 90 percent reestablished...	
12	4.05 Flood Hazard Management Pages 39-40	The County currently implements flood hazard management through: <ul style="list-style-type: none"> • The Lewis County Comprehensive Plan; • The Lewis County CAO; • The latest edition of the Stormwater Management Manual as prepared by Ecology; • The Lewis County Comprehensive Flood Hazard Management Plan; • The Lewis County Multi-Jurisdictional Hazard Mitigation Plan; • Chehalis River Basin Comprehensive Flood Hazard Management Plan; and • Watershed Management Plans; <u>and</u> • CMZ studies including the <i>Geomorphic Evaluation and Channel Migration Zone Analysis Addendum Cowlitz River, near Packwood and Randle, Lewis County, Washington</i>. Standards for shoreline stabilization measures are addressed in SMP Chapter 6: Shoreline Modification Policies and Regulations. 4.05.01 POLICIES ... F. Require new publicly funded dike or levee projects to dedicate and improve public access, subject to the exceptions in SMP Section 4.06.	Minor typographical correction. County requested revision. Provision relocated to new Section 6.08. See Recommended change #59.
13	4.05.02 Flood Hazard Management Page 40	A. All proposed flood hazard management measures shall comply with the County's Comprehensive Flood Hazard Management Plan. B. Development in floodplains shall not increase flood hazards. C. No development is allowed within the SMP flood course or floodway in shoreline jurisdiction, unless a hydraulics and hydrology study shows that it is: <ol style="list-style-type: none"> 1. Not in a SMP flood course or floodway; or 2. Will not impact the pre-project base flood elevations, floodway elevations, or floodway data widths. D. Within the CMZ, SMP flood course or floodway, new development or uses, including subdivision of land, shall not be established when it would be reasonably foreseeable that the development or use would require new structural flood hazard reduction measures. <u>E. New development within floodways, the SMP flood course, and the CMZ shall not interfere with the process of channel migration or cause a net loss of ecological functions. If existing CMZ studies are not available for an area of known channel migration, a site analysis may be required to ensure that development does not interfere with the process of channel migration. Areas of known channel migration are shown in the SMP Map Folio Figure 28 in the Shoreline Inventory and Characterization.</u> <u>F. Development in the CMZ, SMP flood course, and floodways, is limited to:</u> <ol style="list-style-type: none"> 1. <u>Actions that protect or restore ecosystem-wide processes or ecological functions;</u> 2. <u>Forest practices in compliance with the FPA;</u> 3. <u>Existing and ongoing agricultural practices, provided no new restrictions to channel movement occur;</u> 	County suggested reorganization to consolidate standards. H and I are relocated to E and F. The remaining provisions are re-lettered.

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		<p>4. <u>Mining uses conducted consistent with the shoreline environment designation and the provisions of WAC 173-26-241(3)(h);</u></p> <p>5. <u>Bridges, utility lines, and other public utility and transportation structures where no other feasible alternative exists or the alternative would result in an unreasonable and disproportionate cost;</u></p> <p>6. <u>Repair and maintenance of an existing legal use, provided that the repair and maintenance does not cause significant ecological impacts or increase flood hazards to other uses;</u></p> <p>7. <u>Modifications or additions to an existing nonagricultural legal use, provided that channel migration is not further limited and that the new development includes appropriate protection of ecological functions;</u></p> <p>8. <u>Development in UGAs, as defined in Chapter 36.70A RCW, where existing structures prevent active channel movement and flooding; or</u></p> <p>9. <u>Measures to reduce shoreline erosion, if it is demonstrated that the erosion rate exceeds that which would normally occur in a natural condition, the measure does not interfere with fluvial hydrological and geomorphological processes normally acting in natural conditions, and the measure includes appropriate mitigation of impacts to ecological functions associated with the river or stream.</u></p> <p>EG. <u>EG.</u> New structural flood hazard management measures may be permitted if consistent with applicable provisions in <u>in</u> SMP Chapter 6: Shoreline Modification Policies & Regulations.</p> <p>FH. <u>FH.</u> New publicly-funded structural flood hazard management measures, including dikes and levees, shall dedicate and improve public access except in those instances as listed in SMP Section 4.06.02(B).</p> <p>GJ. <u>GJ.</u> Removal of gravel for flood management purposes shall be permitted only after a biological and geomorphological study demonstrates that the extraction:</p> <ol style="list-style-type: none"> 1. Provides a long-term benefit to flood hazard management; 2. Does not result in a net loss of ecological functions; and 3. It is part of a comprehensive flood management solution. <p>H. <u>H.</u> New development within floodways, the SMP flood course, and the CMZ shall not interfere with the process of channel migration or cause a net loss of ecological functions. If existing CMZ studies are not available for an area of known channel migration, a site analysis may be required to ensure that development does not interfere with the process of channel migration. Areas of known channel migration are shown in the SMP Map Folio Figure 28 in the Shoreline Inventory and Characterization.</p> <p>I. <u>I.</u> Development in the CMZ, SMP flood course, and floodways, is limited to:</p> <ol style="list-style-type: none"> 1. Actions that protect or restore ecosystem wide processes or ecological functions; 2. Forest practices in compliance with the FPA; 3. Existing and ongoing agricultural practices, provided no new restrictions to channel movement occur; 4. Mining uses conducted consistent with the shoreline environment designation and the provisions of WAC 173-26-241(3)(h); 5. Bridges, utility lines, and other public utility and transportation structures where no other feasible alternative exists or the alternative would result in an unreasonable and disproportionate cost; 6. Repair and maintenance of an existing legal use, provided that the repair and maintenance does not cause significant ecological impacts or increase flood hazards to other uses; 	<p>Typographical correction.</p>

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		<p>7. Modifications or additions to an existing nonagricultural legal use, provided that channel migration is not further limited and that the new development includes appropriate protection of ecological functions;</p> <p>8. Development in UGAs, as defined in Chapter 36.70A RCW, where existing structures prevent active channel movement and flooding; or</p> <p>9. Measures to reduce shoreline erosion, if it is demonstrated that the erosion rate exceeds that which would normally occur in a natural condition, the measure does not interfere with fluvial hydrological and geomorphological processes normally acting in natural conditions, and the measure includes appropriate mitigation of impacts to ecological functions associated with the river or stream.</p>	
14	<p>4.06.02 I Public Access Page 44</p>	<p>I. Public access easements or tracts and relevant permit conditions shall be recorded as a separate document or on the face of a plat or short plat. Recording with the Lewis County Auditor shall occur <u>prior to or</u> at the time of permit approval.</p>	<p>County suggested revision.</p>
15	<p>4.07 Water Quality Page 45</p>	<p>This section articulates policies and regulations to pPrevent impacts to the quality of ground and surface waters and stormwater impacts that could affect water quality and stormwater quantity that would result in a loss of ecological functions, a significant impact to aesthetic qualities, or recreational opportunities or result in a net loss of ecological functions.</p> <p>4.07.01 Policies</p> <p>A. <u>Use existing regulations to Pprotect shoreline jurisdiction by ensuring that</u> surface water quality and quantity regulations are administered by the <u>within Lewis County.</u></p> <p>B. Prevent impacts to water quality and stormwater quantity that would result in net loss of shoreline ecological function, significant impacts to aesthetic qualities, or recreational opportunities.</p> <p>4.07.02 REGULATIONS</p> <p>A. All development in shoreline jurisdiction shall comply with the appropriate requirements of the SMP and the latest edition of the Stormwater Management Manual as prepared by Ecology.</p> <p>B. Septic systems should be located as far landward of the OHWM and flood course as feasible. <u>Where the systems cannot be located outside of a shoreline or critical area buffer, the system may be sited in accordance with the requirements in 4.04.02(D).</u></p>	<p>County requested revisions to improve clarity.</p>
16	<p>5.02.01 B General Shoreline Use Page 48</p>	<p>B. Where feasible locate <u>non-water dependent</u> accessory structures or uses, such as parking, service buildings or areas, access roads, utilities, signs, and storage, landward of required shoreline buffers, and water-oriented developments and or other approved uses.</p>	<p>County suggested revisions to help clarify the allowance of water-dependent accessory uses such as docks.</p>

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17	5.02.02 C General Shoreline Use Page 49	C. Accessory uses, such as parking, stormwater management facilities, and utilities shall be located outside of the shoreline and critical area buffers and associated building setbacks unless authorized in SMP Section 4.04.02(D)(1)(b).	County requested revisions to clarify the allowance of a limited set of uses accessory or appurtenant uses within buffers, subject to the standards of the SMP and Critical Area Ordinance.												
18	5.03 Allowed Shoreline Uses Page 49	A. SMP Table 5-1: Permitted, Conditional, and Prohibited Uses in this section establishes the uses and development allowed or prohibited within the each shoreline environment designations for each jurisdiction. Uses and developments allowed in the table must, in all cases, be consistent with other applicable provisions of the SMP in order to be authorized. Where there is a conflict between the table and the written provisions in the SMP, the written provisions shall apply. ... F. Accessory or appurtenant uses and structures and development shall be subject to the same shoreline permit process and SMP provisions as their primary use. The structures and developments shall not be constructed An accessory use shall not be established prior to the establishment of their primary use, except when the accessory or appurtenant development is related to the installation of utilities and septic systems for the primary use.	Recommended edits to clarify how the table is used. County requested revisions. Changes suggested to clarify allowance of septic systems.												
19	5.03 Allowed Shoreline Uses Table 5-1 and Notes Pages 50-52	See Exhibit 2 to Attachment C showing recommended changes to Table 5-1 and the Notes.													
20	5.04.02 Shoreline Height Pages 52 - 53	C. Development within the various shoreline environment designations may be increased to the maximum allowed height in LCC 17.145.030 through a shoreline variance that meets the criteria in SMP Section 7.04.03 provided: <ol style="list-style-type: none"> 1. The increase does not substantially block views from adjacent residential properties; 2. Greater height is demonstrated to be needed for an essential element of an allowed use; 3. The project includes compensating elements that substantially enhance the visual and physical public access to the shoreline, if required; and 4. It is demonstrated that No Net Loss of shoreline ecological function will be achieved. <p>Table 5-1: Shoreline Height Regulations</p> <table border="1" data-bbox="451 1279 1602 1489"> <thead> <tr> <th data-bbox="451 1279 639 1489">Height Standard</th> <th data-bbox="639 1279 833 1489">High Intensity</th> <th data-bbox="833 1279 1024 1489">Shoreline Residential</th> <th data-bbox="1024 1279 1214 1489">Rural Conservancy</th> <th data-bbox="1214 1279 1408 1489">Natural</th> <th data-bbox="1408 1279 1602 1489">Aquatic</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Height Standard	High Intensity	Shoreline Residential	Rural Conservancy	Natural	Aquatic							Recommended deletion. The provisions are largely redundant with the provisions in the footnotes to Table 5-2 and the view corridor review in 5.04.02(D).
Height Standard	High Intensity	Shoreline Residential	Rural Conservancy	Natural	Aquatic										

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		<table border="1" data-bbox="451 165 1602 261"> <tr> <td>Maximum Shoreline Height (1)</td> <td>35 feet <u>50 feet (1)</u></td> <td>35 feet (<u>2</u>)</td> <td>35 feet (<u>2</u>)</td> <td>35 feet</td> <td>20 feet</td> </tr> </table> <p>Notes: (1) <u>The maximum height may be up to that allowed by Lewis County Code. Provided that when proposed to exceed 35 feet, a view corridor review per 5.04.02(C) is required.</u> (2) Maximum shoreline height may be increased to the maximum height limit specified in LCC 17.145.030 or otherwise designated in LCC Title 17 subject to approval of a view corridor analysis under SMP Section 5.04.02(DC) and demonstration that the proposal meets the shoreline variance criteria in SMP Section 7.04.03.</p> <p>DC. View Corridor Review Process ... 2.c. Applicants proposing building or structure heights above 35 feet in the High Intensity shoreline environment designation that are consistent with the SMP and underlying zoning allowances, may be approved as part of a shoreline variance if the following criteria are met: ...</p>	Maximum Shoreline Height (1)	35 feet <u>50 feet (1)</u>	35 feet (<u>2</u>)	35 feet (<u>2</u>)	35 feet	20 feet	<p>High Intensity designations contain existing industrial and commercial uses that generally exceed 35'. Recommended revisions allow for the increased height without the need for a shoreline variance.</p> <p>Suggested revision for consistency with the intent of the revisions to Table 5-2.</p>
Maximum Shoreline Height (1)	35 feet <u>50 feet (1)</u>	35 feet (<u>2</u>)	35 feet (<u>2</u>)	35 feet	20 feet				
21	5.05.02 A Agriculture Pages 55-56	<p>A. Applicability</p>  <pre> graph TD D1{Is it an "Agricultural Activity"? [RCW 90.58.065]} D2{Existing as of adoption date of this SMP?} D3{"Normal or necessary" agriculture activity? [RCW 90.58.030]} B1[Compliance with SMP required.] B2[SMP does not apply.] B3[Critical Area Regulations in Appendix 2 apply.] B4[Shoreline Substantial Development Permit not required.] D1 -- NO --> B1 D1 -- YES --> D2 D2 -- NO --> B1 D2 -- YES --> B2 B2 -- BUT --> B3 B1 --> D3 D3 -- YES --> B4 </pre>	<p>Recommended revision to the flow chart improves internal consistency with 5.05.02 (A)(1), the SMA, and the Shoreline Guidelines. RCW 90.58.065 and WAC 173-26-241(3)(a) require that master programs "shall not require modification or limit agricultural activities occurring on agricultural lands."</p> <p>Section 4.04.02 A incorporates the County's Critical Areas regulations by reference (with exceptions). Incorporation by reference makes the referenced critical area provisions part of the approved SMP, and thus subject to the statutory restrictions described above.</p>						

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22	5.05.02 B Agriculture Page 57	<p>7. Agricultural-commercial uses are allowed where indicated in SMP Table 5-1: Permitted, Conditional, and Prohibited Uses and shall be consistent with commercial use standards in SMP Section 5.08.</p> <p>8. ...</p> <p>9. Upland finfish facilities in the shoreline jurisdiction require a shoreline conditional use permit. As part of the permitting process, the applicant will need to provide the Shoreline Administrator with copies of the proper State and Federal permits for their net pen. The review <u>of</u> the application by the Shoreline Administrator will include consideration of the following:</p> <ul style="list-style-type: none"> a. Specific site conditions; b. Current and locally applicable science; c. Potential use conflicts; d. Cumulative impacts; and <p>Potential mitigation and monitoring requirements.</p>	<p>County suggested revision improves internal consistency and consistency with RCW 90.58.065.</p> <p>Typographical corrections and deletion of language which doesn't apply.</p>
23	5.06 Aquaculture Pages 58-59	<p>Aquaculture is the culture or farming of fish, shellfish, or other aquatic plants and animals, excluding upland finfish facilities, which are regulated in SMP Section 5.05. Aquaculture is a preferred use in the shoreline jurisdiction. Locations for aquaculture are relatively restricted due to requirements for water quality, temperature, flows, oxygen content, and adjacent land uses.</p> <p><u>Review as part of this SMP is required for all new aquaculture facilities or farms, as well as projects that seek to expand an aquaculture use beyond the area for which a previous permit was issued. Ongoing maintenance, harvest, replanting, or changing of culture techniques or species do not require review under the SMP, unless the cultivation of the new species or the use of a new culture technique has the potential for significant adverse environmental impacts.</u></p> <p>5.06.02 Regulations</p> <p>A. Applicability</p> <ul style="list-style-type: none"> 1. Review as part of this SMP is required for all new aquaculture facilities or farms, as well as projects that seek to expand an aquaculture use beyond the area for which a previous permit was issued. 2. Ongoing maintenance, harvest, replanting, or changing of culture techniques or species do not require review under the SMP, unless the cultivation of the new species or the use of a new culture technique has the potential for significant adverse environmental impacts. 3. A written statement of exemption in accordance with Section 7.04.04 is required for all aquaculture activities that are reviewed as part of this SMP, but that do not require a shoreline substantial development permit, conditional use permit, or variance. <p>BA. Location</p>	<p>County suggested deletion of section A. Applicability. The text from (A)(1) and (2) is relocated to the preface of section 5.06. (A)(3) is redundant and deleted.</p>
24	5.06.02 B Aquaculture Page 59	<p>B. Location</p> <p>1. Water-dependent portions of aquaculture facilities and their necessary accessories may be located waterward of the OHWM in the Aquatic shoreline environment designation or <u>as well as</u> in the shoreline buffer. Water intakes and discharge structures, water and power conveyances, and fish collection and discharge structures are considered water-dependent or accessory to water-dependent facilities.</p>	<p>Clarifying edit. A single proposal may require aquaculture facilities that are located in both areas.</p>
25	5.06.02 C Aquaculture Page 60	<p>C. General Requirements</p>	<p>Correction to an error. The Department of Health has no authority over the introduction of species. This authority lies only with Department of Fish and Wildlife (WDFW). See RCW 77.12.047, WAC 220-77 and WAC 220-72 which set forth WDFW's authority and permit requirements.</p>

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
		<p>3. New aquatic species that were not previously found or cultivated in the shoreline jurisdiction shall not be introduced into fresh waters without prior written approval of the WDFW and the Washington State Department of Health.</p> <p>4. ...</p> <p>5. No processing of aquaculture products, except for the sorting or culling of the cultured organism and the washing or removal of surface materials or organisms after harvest, shall occur in or over the water unless specifically approved by permit.</p> <p style="padding-left: 20px;">a. All other processing facilities shall be located on land. If within shoreline jurisdiction, such facilities shall be subject to the applicable policies and regulations of SMP Sections 5.06 or 5.10.</p>	<p>County requested edit.</p>
26	<p>5.06.02 D Aquaculture Page 61</p>	<p>D. Application Submittal Requirements</p>	<p>County requested revision.</p>
27	<p>5.07.02 B Boating and Water Access Facilities Page 64</p>	<p>B. General Design Standards for Boating and Water Access Facilities</p> <p>9. Non-water dependent elements and uses, such as decks and gazebos built on docks or piers, are not allowed.</p>	<p>County request to relocate language to E. Supplementary Standards for Docks and Piers, as 5.07.02 E (5). See recommended change #30.</p>
28	<p>5.07.02 C Boating and Water Access Facilities Page 64</p>	<p>C. Supplementary Standards for Boat Ramps, Launches, and Rails</p> <p>2. Boat ramps, launches, and rails may be permitted for in marinas boating and water access facilities, recreational <u>developments</u> uses, and <u>community facilities serving developments with</u> more than four residential units subject to SMP Table 5-1: Permitted, Conditional, and Prohibited Uses.</p>	<p>Recommended revision to clarify the intent of the allowance.</p>
29	<p>5.07.02 D Boating and Water Access Facilities Page 65</p>	<p>D. Supplementary Standards for Boat Lifts and Canopies</p> <p>2. New boat lifts and an accessory boat lift canopies may be permitted as part of an approved dock or pier as specified in SMP Table 5-1: Permitted, Conditional, and Prohibited Uses, so long as the following requirements are met:</p> <p style="padding-left: 20px;">a. The boat lift is placed as far waterward of the OHWM as is feasible and safe, to avoid impacts to nearshore habitat.</p> <p>...</p>	<p>County requested edits to remove duplicative language addressed in Section A. Location Standards.</p>
30	<p>5.07.02 E Boating and Water Access Facilities Page 65-67</p>	<p>E. Supplementary Standards for Docks and Piers</p> <p>2. New docks and piers shall be allowed only for public access and water-dependent uses, including single-family residences, so long as the dock or pier complies with the regulations contained in this section. Docks and piers shall meet the following standards:</p> <p style="padding-left: 20px;">a. Docks and piers serving a single-family residence are <u>allowed</u> defined as water dependent accessory uses, provided they are designed and intended as a facility for access to watercraft. To be authorized, the residential use and the accessory <u>associated</u> dock or pier must be allowed in the underlying upland shoreline environment designation. In instances on Mayfield and Riffe Lake, where a buffer owned by Tacoma Power exists between the water and the</p>	<p>County suggested edits.</p>

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		<p>upland property, the upland property owner may utilize their allowance for an accessory dock on the portion of the buffer property between their lot and the water with the permission of Tacoma Power.</p> <p>b. New docks and piers that are not accessory to <u>associated with single-family</u> residences shall be permitted only when they are intended for public use or when the applicant demonstrates that the new dock or pier supports a water-dependent use. <u>In no instance shall the construction of the dock be allowed to occur before the construction of the residence.</u> ...</p> <p>4. ...</p> <p>d. Proposed docks and piers that do not comply with the dimensional standards above may only be approved if they obtain a shoreline variance. Pursuant to WAC 173-27-040 (2)(b), any existing legal nonconforming dock or pier may be repaired or restored to its original size, dimension, and location without the need for a variance, if it is below the replacement thresholds found in SMP Section 5.07.02(J)(1). Projects undertaken pursuant to this section must be permitted within two years of <u>the</u> removal of the pre-existing, nonconforming structure.</p> <p>...</p> <p>5. <u>Non-water-dependent elements and uses, such as decks and gazebos built on docks or piers, are not allowed.</u></p>	<p>Typographical correction.</p> <p>County request to relocate language from 5.07.02 B(9) to E. Supplementary Standards for Docks and Piers. See recommended change #27 above.</p>
31	<p>5.07.02 F Boating and Water Access Facilities Pages 67-68</p>	<p>F. Supplementary Standards for Marinas</p> <p>3. New marinas shall provide public access amenities such as viewpoints, interpretive displays, and public access to access water-enjoyment uses such as restaurants.</p> <p>...</p> <p>5. Sufficient utility services must be provided concurrent with the <u>development of a marina</u> development or be situated where they are already available. New marinas must include adequate restroom and sewage disposal facilities, such as pump out, holding, <u>and/or</u> treatment facilities.</p>	<p>Typographical correction.</p> <p>County recommended edits.</p>
32	<p>5.07.02 K Boating and Water Access Facilities Pages 70</p>	<p>K. Mitigation</p> <p>1. New or expanded boating and water access facilities should follow the mitigation sequence in SMP Section 4.03.</p> <p><u>2. Appropriate impact minimization measures include ensuring the facility is the minimum size necessary, using grating, placing the facility to avoid the need to dredge, and avoiding critical habitat.</u></p> <p>23. 23. Compensatory mitigation proposals must provide mitigation at a minimum 1:1 ratio, by area, of new overwater cover to mitigation action using one or more of the potential mitigation measures listed below. The ratio should be increased if the measure will take more than one year to provide equivalent function or if the measure does not have a high success rate, as determined by a qualified professional....</p>	<p>Suggested change by County. Added to clarify various measures that could be used in the mitigation sequence.</p>

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33	<p>5.07.02 L Boating and Water Access Facilities Page 70-71</p>	<p>L. Application Submittal Requirements</p> <p>In addition to the general application requirements, the following submittals, as applicable, are necessary for all new or expanded boating and water access facilities:</p> <ol style="list-style-type: none"> 1. A description of the proposed boating and water access facility, including its size, location, design, and any shoreline stabilization or other modification measures; 2. The ownership of the property and aquatic lands; 3. Habitat surveys and critical area studies consistent with SMP Section 4.04; 4. Assessment of potential impacts to existing ecological processes, including but not limited to sediment transport, hydrologic patterns, and vegetation disturbance; 5. A mitigation plan for unavoidable adverse impacts to ecological functions or processes pursuant to SMP Section 4.04; 6. A slope bathymetry map when deemed beneficial by the Shoreline Administrator; 7. An assessment of existing water dependent uses in the vicinity and a documentation of the potential impacts to those uses and mitigating measures; and <p>1. Beyond these requirements, For new or expanded marina facilities, applicants must provide an assessment of need and demand for <u>the facility</u> all new or expanded marina facilities, including but not limited to:</p> <ol style="list-style-type: none"> a. Existing approved facilities, or pending applications, within the service range of the proposed new or expanded facility; b. The expected population served by the facility; and c. Boat ownership characteristics of the population, if that information supports justification for specific design elements related to facility length or width, necessary water depth, or other design factors 	<p>County requested revisions. Requirements under WAC 173-27-180 and the standards for HPA effectively address the provisions proposed for deletion.</p>
34	<p>5.08.02 B Commercial Development Pages 72</p>	<p>B. Where commercial uses are allowed, Nnew non-water-oriented commercial development is prohibited in shoreline jurisdiction unless it meets one of the following criteria:</p> <ol style="list-style-type: none"> 1. The commercial use is part of a mixed-use project that includes a water-dependent, water-related, or water-enjoyment use and provides a significant public benefit such as providing public access or ecological restoration.; <u>The non-water-oriented portion of the project must be located landward of the water-oriented portion of the development.</u> 2. <u>The proposal</u> is an expansion of a commercial use that existed at the time of the SMP update that does not move any closer to the shoreline; 3. Navigability is severely limited at that location and the commercial use provides a significant public benefit such as public access or ecological restoration. <u>The standard shoreline buffer shall be 150 feet from the OHWM;</u> or 	<p>Suggested revisions for clarity.</p>

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		4. The commercial use is physically separated from the shoreline by another property, railroad, or public right of way.	
35	5.09.02 A Forest Practices Page 73	All forest practices, including forest conversions, undertaken on shorelines shall comply with the applicable policies and provisions of the FPA, the SMP, Chapter 76.09 RCW as amended, and Chapter 222 WAC as administered by the County.	County requested revision. The county does not administer WAC 222.
36	5.10.02 B Industrial Development Page 75	<p>B. Where industrial uses are allowed, new <u>Non-water-oriented industrial uses are prohibited in the shoreline jurisdiction unless they meet one of the following criteria:</u></p> <ol style="list-style-type: none"> 1. It is part of a mixed-use project that includes a water-dependent, water-related, or water-enjoyment use and provides a significant public benefit such as providing public access or ecological restoration; <u>The non-water-oriented portion of the project must be located landward of the water-oriented portion of the development.</u> 2. It is an expansion of an industrial use that existed at the time of the SMP update that does not move any closer to the shoreline; 3. Navigability is severely limited on the site and the industrial use provides a significant public benefit of such as <u>providing public access or ecological restoration. The standard shoreline buffer shall be 150 feet from the OHWM;</u> or 4. The site is physically separated from the shoreline by another property or public right of way. 	Suggested revisions for clarity
37	5.11.01 C - D Mining Page 76	<p>B. Do not locate new mining on shorelines where unavoidable adverse impacts on other users or resources, <u>when</u> taken together, equal or outweigh the benefits from <u>the</u> mining.</p> <p>C. Minimize the <u>negative</u> impacts of from <u>mining, such as aesthetics, dust, noise, etc.,</u> on existing public access points and water-dependent or enjoyment uses. <u>Potential impacts may include aesthetic impacts, dust, noise, etc.</u></p> <p>D. Begin land reclamation immediately after the termination of mining operations. The Use <u>Use</u> of reclaimed mine property must be consistent with the SMP and provide <u>advance</u> appropriate ecological functions <u>that are suited for the site and</u> consistent with the location and State Surface Mining Reclamation Act requirements.</p>	County requested revisions.
38	5.11.02 A Mining Page 76	A. Application for mining permits within shoreline jurisdiction shall be accompanied by operation plans, reclamation plans, and an analysis of environmental impacts sufficient to make a determination as to whether the project will result in net loss of shoreline ecological functions and processes during over the course of <u>the</u> mining and after reclamation.	County requested edits.
39	5.12.02 C Parking Page 78	C. Exterior parking facilities shall be designed and landscaped to minimize adverse impacts upon <u>to</u> adjacent and abutting properties <u>in</u> shoreline jurisdiction.	Typographical corrections.
40	5.13.01 F Recreational Development Page 78	F. Protect the rights of private property owners, and help to minimize <u>the</u> adverse the impacts on private land associated with neighboring public access points.	Typographical corrections.

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41	5.13.02 E and I Recreational Development Page 79	E. Wildlife viewing structures and permeable trails or raised boardwalks, are allowed within riparian shoreline and wetland buffers in accordance with the mitigation sequence in SMP Section 4.03 and the critical area regulations in SMP Section 4.04. ... I. In addition to these standards, commercial recreational development shall be consistent with the provisions for commercial development in SMP Section 5.08.	Recommended for internal consistency with Table 4-1 and 4.04.02(B)(1). County requested deletion. This is addressed in footnotes to Table 5-1.
42	5.14 Residential Development Pages 79 – 80	Residential development includes single-family residences, multifamily development, and appurtenant structures and uses, including garages, sheds, fences, necessary utilities, and driveways <u>as well as the creation of new residential lots through land division</u> . Single-family residences are a priority use when developed in a manner consistent with no net loss of environmental <u>ecological</u> functions... ... 5.14.01 Policies F. Consider single-family residences a priority use in planning for uses in the shoreline jurisdiction when developed with no net loss of environmental <u>ecological</u> functions. G. Consider accessory <u>and appurtenant uses developments</u> , such as driveways, utilities, and other appurtenances <u>septic systems</u> , as part of the primary residential use and review <u>the developments</u> under the standards of this section.	Recommended edit improves consistency with WAC 173-26-241(3)(j) and internal consistency with 5.14.02 (B) and the definition in Section 8 of the SMP. (F) Edits ensure consistency of terms throughout the SMP which uses “no net loss of <i>ecological</i> functions” (G) Revisions suggested by County to clarify the allowance of septic systems.
43	5.14.02 E - H Residential Development Pages 81-82	E. The primary residential use on any lot shall be established prior to any accessory structures <u>residential uses</u> . F. Accessory and appurtenant uses developments and structures not specifically addressed in the SMP shall be subject to the same regulations as the primary residence. <u>Provided that septic systems, drainfields and other accessory or appurtenant developments, may be located within a critical area or shoreline buffer when no other option exists, and the proposal meets the requirements in Section 4.04.02(D).</u> F-G. Primary residential uses are prohibited over the water. G-H. Residential accessory and appurtenant structures and uses shall be prohibited over the water, unless clearly water-dependent. H. Residential appurtenant and accessory structures or uses are prohibited within shoreline buffers unless specifically authorized in SMP Section 4.04.	County suggested revisions to clarify the allowance of septic systems. Language in 5.14.02(H) is generally addressed in the revisions to (E).
44	5.15.01 B Signs Page 82	B. Ensure that signs are sized and placed to the protect the vistas and viewpoints <u>views</u> of shorelines, waterbodies, and surrounding landscapes from public properties and rights of way.	County suggested edits.
45	5.16 Transportation Facilities Page 83-84	Transportation facilities include structures that provide for the movement of people, goods, and services by land, air, and water. Transportation facilities include highways, bridges, bikeways, airports, and other related facilities. This section applies to new and expanded transportation facilities within shoreline jurisdiction. <u>A driveway for an individual single-family residence is considered part of the primary use and it should be reviewed as part of Section 5.14.</u> 5.16.01 POLICIES	Deletion of the Applicability section is recommended. The redundant language is proposed to be deleted and the remaining language in 5.16.02 (B) relocated to the introduction.

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		<p>5.16.02 APPLICABILITY</p> <p>A. This section applies to public and private transportation facilities serving motorized and nonmotorized uses.</p> <p>B. A driveway for an individual single family residence is considered part of the primary use and it should be reviewed as part of SMP Section 5.14.</p> <p>5.16.032 REGULATIONS</p> <p>A. <u>New</u> Transportation facilities shall only be placed within shoreline jurisdiction, when no other option for the location of the facility exists. If no alternative exists to placing a new transportation facility in shoreline jurisdiction, a mitigation plan prepared by a qualified professional must be prepared consistent with the provisions of SMP Section 4.04.</p> <p>B. When located within the shoreline jurisdiction, new and expanded transportation facilities shall:</p> <ol style="list-style-type: none"> 1. Be set back from the OHWM as far as feasible and locate any new water crossings as near to perpendicular with the waterbody as feasible, unless an alternate path would minimize the disturbance of native vegetation or result in the avoidance of critical areas; 2. Be designed with the minimum pavement area required; 3. Minimize adverse effects to unique or fragile shoreline features; 4. Implement the mitigation sequence in SMP Section 4.03 and ensure no net loss of shoreline ecological functions; 5. <u>Include a mitigation plan prepared by a qualified professional consistent with the provisions of Section 4.04;</u> 6. Avoid adverse impacts on existing or planned water-dependent uses; 7. Allow <u>the</u> joint use of the right-of-way with nonmotorized uses and existing or planned primary utility facilities to consolidate the crossings of waterbodies and minimize adverse impacts to shoreline jurisdiction, where feasible; and 8. Provide and <u>/or</u> maintain visual access to scenic vistas on public roads, where feasible. Visual access may include, but is not limited to turnouts, rest areas, and picnic areas. <p><u>C. Crossings of waterbodies, such as bridges, shall be designed to minimize impact to aquatic habitat, allow for fish passage, and permit the passage of flood debris.</u></p>	<p>County requested revisions and edits to the regulations to improve readability and implementation.</p>

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		<p>C-D. Existing roads that are of a non-paved surface, such as gravel, may be paved, if the facilities comply with all applicable mitigation, water quality, stormwater, and landscaping standards, as well as other requirements of the SMP and local regulations.</p> <p>D-E. Seasonal work windows may be required for construction projects to minimize impacts to shoreline functions.</p> <p>E-F. Where public access to shorelines across transportation facilities is intended, facility designs must provide safe pedestrian and non-motorized vehicular crossings.</p> <p>F. Crossings of waterbodies, such as bridges, shall be designed to minimize impact to aquatic habitat, allow for fish passage, and the passage of flood debris.</p>	
<p>5.17 46 Utilities Pages 84 - 87</p>		<p>The provisions of this section apply only to <u>public and private</u> facilities that produce, convey, store, or process power, gas, sewage, communications, oil, or waste. <u>Utilities serving an individual use, or On-site utility features serving a primary use, such as an electrical line or water, sewer or gas lines to an individual use,</u> are considered accessory utilities and shall be considered under the standards of the primary use of the property. <u>Water intake and water or fish conveyances between a waterbody and an aquaculture facility are not considered utilities under this section. Consult Section 5.06.</u></p> <p>5.17.01 POLICIES</p> <p>5.17.02 APPLICABILITY</p> <p>A. This section applies to public and private utility facilities and lines serving more than an individual use.</p> <p>B. Utilities serving an individual use are considered part of the primary use and should be reviewed under the regulations for that use.</p> <p>C. Water intake and water or fish conveyances between a waterbody and an aquaculture facility are not considered utilities under this section of the SMP. Consult SMP Section 5.06.</p> <p>5.17.03 REGULATIONS</p> <p>A. All utility system projects and maintenance activities shall be designed, located, and installed and conducted in a manner, which that results in no net loss of ecological function.</p> <p>B. Water oriented utilities are allowed in the shoreline jurisdiction.</p> <p>C. If a utility is required to be sited in shoreline jurisdiction, a mitigation plan prepared by a qualified professional must be prepared consistent with the provisions of SMP-Section 4.04.</p> <p>D. Where utilities must be <u>are</u> located in shoreline jurisdiction, the utilities must:</p> <ol style="list-style-type: none"> 1. Be designed and constructed to meet all adopted engineering standards of the County. 2. Provide for compatible, multiple use sites, and rights-of-way whenever feasible. Compatible uses <u>may</u> include shoreline access points, trails, and other forms of recreation and transportation, provided <u>that</u> these 	<p>Deletion of the Applicability section is recommended. The redundant language is proposed to be deleted and the remaining language in 5.17.02 (C) is relocated to the introduction.</p> <p>County requested revisions and edits to the regulations to improve readability and implementation.</p>

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		<p>uses do not interfere with <u>the operation of the utility operation</u>, endanger public health and safety, or cause a significant and disproportionate liability for the owner.</p> <p>3. Minimize processes affecting the rate of channel migration <u>and/or</u> shoreline erosion. Where this <u>increased rates of shoreline erosion</u> may occur, the Shoreline Administrator may require a monitoring plan and adaptive management plan <u>measures that is</u> prepared by a qualified professional as appropriate.</p> <p>4. Limit clearing to the minimum necessary for installation or maintenance. Impacts associated with removal of vegetation or clearing shall be mitigated on site.</p> <p><u>ED.</u> In addition to the standards above, utility lines within the shoreline jurisdiction shall:</p> <ol style="list-style-type: none"> 1. Be undergrounded in areas developed on an <u>at a more</u> urban level, such as UGAs, Limited Areas of More Intensive Rural Development (LAMIRDs), and resorts, except where technical, environmental, or geological conditions make undergrounding infeasible. 2. Be sited within the footprint of an existing right-of-way or utility easement, wherever feasible, <u>especially</u> in locations where right-of-ways and easements exist. 3. Avoid paralleling the shoreline or following a down-valley course near the channel, except where located in an existing road or easement footprint. <p><u>FE.</u> If an underwater location is necessary for the siting of utilities, the following performance standards apply:</p> <ol style="list-style-type: none"> 1. The design, installation, and operation shall minimize impacts to the waterway and the resident aquatic ecosystems. 2. Seasonal work windows may be made a condition of approval. 3. All State and Federal permits must be obtained. 4. A maintenance schedule and emergency repair protocol shall be prepared and recorded. <p>F. <u>Trenching to allow the installation of underground utilities, Dredging/trenching for underwater utilities is only allowed if no feasible alternative location for the utilities exists, and:</u></p> <ol style="list-style-type: none"> 1. <u>Impacts to fish and wildlife habitat are minimized to the maximum extent feasible;</u> 2. <u>The utility installation does not increase or decrease the natural rate, extent, or chance of channel migration; and</u> 3. <u>Appropriate BMPs are employed to prevent water quality impacts or other environmental degradation.</u> <p>G. After the installation of a utility system or the completion of a maintenance project, the disturbed area shall be regraded to match the natural terrain and replanted to prevent erosion and provide appropriate vegetative cover, including meeting <u>and meet any other applicable standards from</u> of SMP Section 4.04.</p>	<p>County request to relocate the provision from 6.04.02 A (2)(e) to consolidate utility-related language. Additional minor revisions are suggested. See recommended change 51.</p>

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47	<p>Table 6-1 Modification Table Pages 88-89</p>	<p>Table 6-2: Permitted, Conditional, and Prohibited Shoreline Modifications</p> <table border="1"> <thead> <tr> <th data-bbox="451 215 897 386">Shoreline Modifications (1)(2)</th> <th data-bbox="897 215 1067 386">High Intensity</th> <th data-bbox="1067 215 1271 386">Shoreline Residential</th> <th data-bbox="1271 215 1475 386">Rural /Urban Conservancy</th> <th data-bbox="1475 215 1631 386">Natural</th> <th data-bbox="1631 215 1784 386">Aquatic (2)</th> </tr> </thead> <tbody> <tr> <td colspan="6" data-bbox="451 386 1784 418">Key: P = Permitted Use, C = Conditional Use, X = Prohibited</td> </tr> <tr> <td data-bbox="451 418 897 451">Clearing and Grading</td> <td data-bbox="897 418 1067 451">P</td> <td data-bbox="1067 418 1271 451">P</td> <td data-bbox="1271 418 1475 451">P</td> <td data-bbox="1475 418 1631 451">C</td> <td data-bbox="1631 418 1784 951" rowspan="10" style="writing-mode: vertical-rl; text-orientation: mixed;">See adjacent upland shoreline environment designation</td> </tr> <tr> <td colspan="5" data-bbox="451 451 1631 483">Placement of Fill</td> </tr> <tr> <td data-bbox="451 483 897 516">Placement of Fill Landward of OHWM</td> <td data-bbox="897 483 1067 516">P</td> <td data-bbox="1067 483 1271 516">P</td> <td data-bbox="1271 483 1475 516">P</td> <td data-bbox="1475 483 1631 516">C</td> </tr> <tr> <td data-bbox="451 516 897 618"><u>Placement of Fill Waterward of OHWM associated with an Ecological Restoration Project (3)</u></td> <td data-bbox="897 516 1067 618">P</td> <td data-bbox="1067 516 1271 618">P</td> <td data-bbox="1271 516 1475 618">P</td> <td data-bbox="1475 516 1631 618">C</td> </tr> <tr> <td data-bbox="451 618 897 721">Placement of Fill Waterward of OHWM <u>not associated with an Ecological Restoration Project (3)</u></td> <td data-bbox="897 618 1067 721">C</td> <td data-bbox="1067 618 1271 721">C</td> <td data-bbox="1271 618 1475 721">C</td> <td data-bbox="1475 618 1631 721">C</td> </tr> <tr> <td data-bbox="451 721 897 786">Dredging and Dredge Material Disposal (3)</td> <td data-bbox="897 721 1067 786">C</td> <td data-bbox="1067 721 1271 786">C</td> <td data-bbox="1271 721 1475 786">C</td> <td data-bbox="1475 721 1631 786">C</td> </tr> <tr> <td data-bbox="451 786 897 818">In-Water Structures (4)</td> <td data-bbox="897 786 1067 818">C</td> <td data-bbox="1067 786 1271 818">C</td> <td data-bbox="1271 786 1475 818">C</td> <td data-bbox="1475 786 1631 818">C</td> </tr> <tr> <td data-bbox="451 818 897 850">Restoration (5)</td> <td data-bbox="897 818 1067 850">P</td> <td data-bbox="1067 818 1271 850">P</td> <td data-bbox="1271 818 1475 850">P</td> <td data-bbox="1475 818 1631 850">P</td> </tr> <tr> <td colspan="5" data-bbox="451 850 1631 883">Shoreline Stabilization</td> </tr> <tr> <td data-bbox="451 883 897 915">Hard Shoreline Stabilization Measures</td> <td data-bbox="897 883 1067 915">P</td> <td data-bbox="1067 883 1271 915">P</td> <td data-bbox="1271 883 1475 915">C</td> <td data-bbox="1475 883 1631 915">X</td> </tr> <tr> <td data-bbox="451 915 897 948">Soft Shoreline Stabilization Measures</td> <td data-bbox="897 915 1067 948">P</td> <td data-bbox="1067 915 1271 948">P</td> <td data-bbox="1271 915 1475 948">P</td> <td data-bbox="1475 915 1631 948">C</td> </tr> </tbody> </table>	Shoreline Modifications (1)(2)	High Intensity	Shoreline Residential	Rural /Urban Conservancy	Natural	Aquatic (2)	Key: P = Permitted Use, C = Conditional Use, X = Prohibited						Clearing and Grading	P	P	P	C	See adjacent upland shoreline environment designation	Placement of Fill					Placement of Fill Landward of OHWM	P	P	P	C	<u>Placement of Fill Waterward of OHWM associated with an Ecological Restoration Project (3)</u>	P	P	P	C	Placement of Fill Waterward of OHWM <u>not associated with an Ecological Restoration Project (3)</u>	C	C	C	C	Dredging and Dredge Material Disposal (3)	C	C	C	C	In-Water Structures (4)	C	C	C	C	Restoration (5)	P	P	P	P	Shoreline Stabilization					Hard Shoreline Stabilization Measures	P	P	C	X	Soft Shoreline Stabilization Measures	P	P	P	C	<p>County revisions to address fill placed waterward of the OHWM consistent with the standard in 6.03.02(F).</p>
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48	<p>6.03.01 Clearing, Grading, and Fill Page 91-93</p>	<p>Clearing, grading, and the placement of fill are the activities associated with preparing a site for development, as well as physically altering topography. The clearing and grading regulations in this section apply to activities landward of the OHWM and the placement of fill applies both waterward and landward of the OHWM.</p> <p>See SMP Section 6.04 for dredging for purposes of flood control, navigation, primary utility installation, the construction of water-dependent portions of essential public facilities, or restoration.</p> <p>6.03.01 POLICIES</p> <p>...</p> <p>D. Allow clearing, grading, and the placement of fill only as part of a permitted development in shoreline jurisdiction.</p> <p>6.03.02 REGULATIONS</p> <p>A. <u>Clearing, grading, and the placement of fill shall be minimized to the extent feasible and only allowed when necessary to accommodate an approved shoreline use or development.</u></p>	<p>The provision addressing trenching for utilities is relocated to the Utilities Section so deletion of the phrase is recommended. See Recommended Changes # 46 and 51</p> <p>County requested deletion. The language is duplicative of that in Policy B.</p> <p>County requested revisions and edits to the regulations to improve readability and implementation.</p>																																																																				

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
		<p>AB. All clearing, grading, and the placement of fill shall be located, designed, and constructed to protect shoreline ecological functions and ecosystem-wide processes, including channel migration.</p> <p>B. Clearing, grading, and the placement of fill shall be minimized to the extent feasible and only allowed when necessary to accommodate an approved shoreline use or development.</p> <p>C. Speculative clearing, grading, and the placement of fill are prohibited.</p> <p>D. When clearing, grading, or the placement of fill <u>will cause</u> adverse impacts to ecological functions, a mitigation plan, prepared by a qualified professional, must be prepared <u>completed</u> consistent with the provisions of SMP Section 4.04.</p> <p>E. Clearing, grading, and the placement of fill within wetlands, floodways, or CMZs, and/or the placement of fill waterward of the OHWM, is only allowed when:</p> <ol style="list-style-type: none"> 1. Due consideration has been given to the site specific conditions; 2. All impacts have been mitigated; 3. All required State and Federal permits have been obtained; and 4. The shoreline use or development is one of the following: <ol style="list-style-type: none"> a. A water-dependent use or public access to the shoreline; b. The cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan;... <p>F. All placement of fill waterward of the OHWM that is not associated with an ecological restoration project shall require a shoreline conditional use permit.</p> <p>G. ...</p> <p><u>H.</u> Clearing, grading, and the placement of fill shall not be located where shoreline stabilization will be necessary to protect the materials placed or removed, except when part of an approved plan for <u>the</u> protection of historic or cultural resources, or as part of an approved environmental cleanup plan or project.</p>	<p>County suggested revision moves the permit requirements for fill placed waterward of the OHWM to Table 6-1.</p> <p>Typographical correction.</p>
49	<p>6.03.02 E Clearing, Grading and Fill Pages 92-93</p>	<p>E. Clearing, grading, and the placement of fill within wetlands, floodways, or CMZs, and/or the placement of fill waterward of the OHWM, is only allowed when:</p> <ol style="list-style-type: none"> 1. Due consideration has been given to the site specific conditions; 2. All impacts have been mitigated; 3. All required State and Federal permits, <u>and necessary approvals from WDNR for state-owned aquatic lands</u>, have been obtained; and 4. The shoreline use or development is one of the following: ... 	<p>In response to a comment from Department of Natural Resources the County has suggested additional language.</p>

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
50	6.04.01 Dredging and dredge material disposal Page 94	C. Permit dredging as part of restoration or enhancement, public access, flood storage <u>as part of a flood hazard management program</u> , or navigation if deemed consistent with the SMP. D. Prohibit dredging waterward of the OHWM to obtain fill except when the dredge material is necessary for the restoration of shoreline ecological functions or as part of a flood hazard management program .	Revisions ensure consistency with WAC 173-26-231(3)(f) and WAC 173-26-221(3) and for internal consistency with Section 4.05.
51	6.04.02 A Dredging and dredge material disposal Page 95	A. Dredging ... 2.e. Trenching to allow the installation of underground utilities, if no feasible alternative location for the utilities exists, and: 1) Impacts to fish and wildlife habitat are minimized to the maximum extent feasible; 2) The utility installation does not increase or decrease the natural rate, extent, or chance of channel migration; and 3) Appropriate BMPs are employed to prevent water quality impacts or other environmental degradation. fe. ... 4. Dredging shall be prohibited for the primary purpose of obtaining fill material, except when permitted under SMP Section 4.05 or when necessary for the restoration of shoreline ecological functions. <u>In the latter case and consistent with the following:</u> a. Dredge material must be placed waterward of the OHWM. b. The project must be associated with either a MTCA or CERCLA habitat restoration project or, if the project is approved through a shoreline conditional use permit, the project may be another significant habitat enhancement project. ...	County requested revision to consolidated utility provisions and relocate the language in 6.04.02(A)(2)(e) to Section 5.17 Utilities. See Recommended change #46. Revisions for clarity.
52	6.04.02 B Dredging and dredge material disposal Page 96	3. Disposal of dredge material within CMZs is discouraged. In the limited instances where it is allowed, such disposal shall require a shoreline conditional use permit, if <u>if</u> This provision is not intended to address the discharge of dredge material into the flowing current of a river or in deep water within the channel where it does not substantially affect the geohydrologic character of the CMZ.	County requested edit.
53	6.05.01 G In-Water Structures Page 97	G. Incorporate native vegetation as part of the design of in-water structures to enhance ecological functions, create a more natural appearance, <u>and</u> improve ecological processes, and provide more flexibility for long term shoreline management.	County requested revision. The intent of the deleted phrase is not clear.
54	6.05.02 In-Water Structures Page 98	K. Motor vehicles, appliances, or other solid waste shall not be used as in-water structures. Demolition debris <u>and reclaimed materials that are</u> is non-toxic, <u>and</u> non-chemically contaminating, reclaimed materials may be used.	County suggested edits.
55	6.07.01 Shoreline stabilization Pages 102	M. Incorporate multiple uses, restoration, and public shoreline access in the location, design, and maintenance of shoreline stabilization structures for public developments, whenever compatible with the primary purpose of the shoreline stabilization.	County suggested edit.
56	6.07.02 B Shoreline stabilization Pages 103 - 104	<i>B. Repair and Maintenance of Existing Shoreline Stabilization Structures</i> 1. The following items distinguish between maintenance and repair of a shoreline stabilization structure and a new structure: a. Maintenance and repair includes modifications to an existing shoreline stabilization structure that is designed to ensure the continued function of the existing structure. b. A modification that increases the size of the existing shoreline stabilization structure shall be considered a new structure, not maintenance or repair.	Recommended edit. This replacement limit makes sense on densely developed shorelines with numerous small lots but seems overly restrictive in a rural county.

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		<p>c. Replacement of greater than 50 percent or 25 feet of linear length of an existing shoreline stabilization structure, whichever is smaller, as measured on a cumulative basis since the structure was established, is not considered repair or maintenance, and is considered a new structure.</p> <p>...</p> <p>3. Repair of shoreline stabilization structures meeting all the criteria for exemption from a shoreline substantial development permit must still comply with SMP Section 6.07.02 (FE) and the SMP.</p>	<p>Citation correction due to relocation of <i>D. Standards to Demonstrate Need for Flood Hazard Stabilization Structures</i> to new Section 6.08. See Recommended change # 59</p>
57	<p>6.07.02 D Shoreline stabilization Pages 104 - 105</p>	<p>D. Standards to Demonstrate Need for Flood Hazard Stabilization Structures Where a project is specially intended to reduce flood hazards, a flood hazard shoreline stabilization structure shall only be allowed when a scientific and engineering analysis demonstrates:</p> <ol style="list-style-type: none"> 1. That the structure is necessary to protect existing development; 2. That nonstructural measures are not feasible; 3. That impacts on ecological functions and priority species and habitats can be successfully mitigated so as to assure no net loss; and 4. That appropriate vegetation conservation actions are undertaken consistent with SMP Chapter 4.04. <p><u>ED. Standards to Demonstrate Need for Other Shoreline Stabilization Structures</u></p> <ol style="list-style-type: none"> 1. New shoreline stabilization structures shall only be allowed, when <u>the following standards are met demonstrated to be necessary as follows:</u> <ol style="list-style-type: none"> a. <u>Natural processes are causing the shoreline erosion;</u> b. <u>Site erosion is not being caused by upland conditions, such as drainage and the loss of vegetation;</u> c. <u>Nonstructural measures, such as planting vegetation or installing on-site drainage improvements, are not feasible or sufficient to address erosion causes or impacts adequately; and</u> d. <u>The need to protect primary structures or water dependent uses from damage due to erosion is demonstrated through a geotechnical analysis. Normal sloughing, erosion of steep bluffs, or shoreline erosion in itself, without a geotechnical analysis, is not demonstration of need.</u> <ol style="list-style-type: none"> a. To protect an existing primary structure, including a residence, if there is conclusive evidence documented by a geotechnical analysis that the primary structure is in danger from shoreline erosion caused by natural processes. Normal sloughing, erosion of steep bluffs, or shoreline erosion in itself, without a geotechnical analysis, is not demonstration of need. The geotechnical analysis shall evaluate on-site drainage issues and address problems away from the OHWM before considering new shoreline stabilization structures. b. In support of water dependent development when all of the conditions below apply: <ol style="list-style-type: none"> 1) Site erosion is not being caused by upland conditions, such as drainage and the loss of vegetation; 2) Nonstructural measures, such as planting vegetation or installing on-site drainage improvements, are not feasible or sufficient to address erosion causes or impacts adequately; and 3) The need to protect primary structures from damage due to erosion is demonstrated through a geotechnical analysis. c. In support of new non-water dependent development, including residences, when all of the conditions from water dependent development from SMP Section 6.07.02(D)(1)(b) apply and nonstructural measures, such as placing the proposed development farther from the shoreline are 	<p>County request to reorganize and consolidate provisions related to Flood Hazard Stabilization Structures. Section 6.07.02(D) is relocated to new Section 6.08 to consolidate provisions addressing flood hazard stabilization structures.</p> <p>County suggested rewrite and reorganization of 6.07.02(E) to improve clarity for implementation.</p>

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		<p>not feasible or sufficient to address the erosion impacts adequately. Natural processes must be causing the shoreline erosion.</p> <p>2. <u>Shoreline stabilization structures may also be allowed</u> To protect historic or cultural resources, or as part of restoration or hazardous substance remediation projects pursuant to Chapter 70.105 RCW, when nonstructural measures, such as planting vegetation or installing on-site drainage improvements, are not feasible or sufficient to adequately address the causes of erosion or avoid continued degradation, disturbance, or erosion of a site....</p>	
58	<p>6.07.02 F Shoreline Stabilization Pages 106-108</p>	<p>FE. General Design Standards</p> <p>1. Shoreline stabilization measures shall not result in a net loss of shoreline ecological function.</p> <p>2. When a hard or soft shoreline stabilization structure is demonstrated to be necessary, the following design standards shall be incorporated as part of the design:</p> <p>a. Impacts to sediment transport shall be avoided, minimized, or mitigated....</p> <p>...</p> <p>f. Fill behind shoreline stabilization structures is limited to one cubic yard per running foot of stabilization. Filling in excess of this amount shall be considered a regulated activity subject to the regulations in SMP Section 6.03 and require a shoreline substantial development permit or shoreline conditional use permit.</p> <p>g. All approved new, enlarged, or replacement shoreline stabilization structures shall be designed using BMPs, including WDFW's Integrated Streambank Protection Guidelines, and minimize and mitigate unavoidable adverse impacts to <u>public and private properties and ecological functions</u>, consistent with SMP Section 4.04, and to public and private properties....</p> <p>...</p> <p>i. New structures that are specifically designed for flood hazard reduction shall be placed landward of associated wetlands and designated vegetation conservation areas, except when the measure would increase ecological functions, such as when included as part of a wetland restoration. Provided that, such flood hazard reduction structures may be authorized if it is determined that no other alternative to reduce the flood hazard to existing development is feasible. The need for, and analysis of feasible alternatives to, structural improvements shall be documented through a geotechnical analysis. ...</p> <p>...</p> <p>m. Shoreline stabilization shall be designed not to <u>not</u> significantly interfere with normal surface or subsurface drainage into the adjacent waterbody. ...</p> <p>po. Publicly financed or subsidized shoreline erosion control measures shall allow appropriate public access to the shoreline except where such access is determined to be infeasible because of incompatible uses, safety, security, or <u>its potential to harm</u> to ecological functions or the rights of adjacent landowners. In cases where the property has been taken by eminent domain, the condemning agency shall not allow public access unless it informs the court and property owner(s) that that the land is being taken for the purpose, potentially among others, of providing public access to the shoreline.</p>	<p>(f) Edits improve clarity and delete unnecessary language. All shoreline activities are regulated. The intent of this regulation is to ensure fill that exceeds the standard in the first sentence is also reviewed against the provisions of the SMP Section on fill.</p> <p>(g) County suggested revision for readability.</p> <p>(i) County request to relocate language to new Section 6.08. See proposed 6.08.02(B). Recommended Change 59</p> <p>(m) County suggested revision for readability.</p> <p>(p) County suggested revision for readability.</p>

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59	<p>NEW Section 6.08 Structural Flood Hazard Reduction Measures</p>	<p><u>6.08 STRUCTURAL FLOOD HAZARD REDUCTION MEASURES</u> <u>This section applies to structural flood hazard reduction measures as specified in SMP Section 4.05.</u></p> <p><u>6.08.01 POLICIES</u> <u>A. Establish standards for structural flood hazard reduction measures to minimize environmental impacts and ensure no net loss of shoreline ecological functions.</u> <u>B. Require new publicly funded dike or levee projects to dedicate and improve public access, except when subject to the exceptions in SMP Section 4.06.</u></p> <p><u>6.08.02 REGULATIONS</u> <u>A. Where a project is specially intended to reduce flood hazards, a flood hazard shoreline stabilization structure structural flood hazard reduction measures shall only be allowed when a scientific and engineering analysis demonstrates:</u></p> <ol style="list-style-type: none"> <u>1. That the structure is necessary to protect existing development;</u> <u>2. That nonstructural measures are not feasible;</u> <u>3. That impacts on ecological functions and priority species and habitats can be successfully mitigated so as to assure no net loss; and</u> <p><u>That appropriate vegetation conservation actions are undertaken consistent with SMP Chapter 4.04.</u></p> <p><u>B. New flood hazard reduction structures that are specifically designed for flood hazard reduction shall be placed landward of associated wetlands and designated vegetation conservation areas, except when the measure would increase ecological functions, such as when included as part of a wetland restoration. Provided that, such flood hazard reduction structures may be authorized if it is determined that no other alternative to reduce the flood hazard to existing development is feasible. The need for, and analysis of feasible alternatives to, structural improvements shall be documented through a geotechnical analysis.</u></p> <p><u>C. New publicly-funded structural flood hazard management measures, including dikes and levees, shall dedicate and improve public access except in those instances as listed in SMP Section 4.06.02(B).</u></p>	<p>County suggested new section to consolidate provisions addressing structural flood hazard reduction measures. Language is largely relocated from other sections into 6.08.</p> <p>(B) Language is relocated from 4.05.01(F). See Recommended change 12.</p> <p>(A) Language is relocated from 6.07.02(D) and slightly revised. See Recommended change 57.</p> <p>(B) Language is relocated from 6.07.02(F)(2)(i) and slightly revised. See recommended change 58.</p> <p>Language is added to implement Policy 6.08.01(B).</p>
60	<p>7.02.02 Provisions Applicable to All Shoreline Permits Page 111</p>	<p>A. Unless specifically exempted by statute (<u>see RCW 90.58.355</u>), all proposed uses and development occurring within shoreline jurisdiction must conform to local development codes and standards, Chapter 90.58 RCW, the SMA, and this SMP whether or not a permit is required....</p> <p>C. Applications for shoreline substantial development permits, conditional use permits, and variances shall be processed in accordance with the provisions of LCC Chapter 17.25; if, where the provisions of the County code and the administration and permitting provisions of the SMP conflict, the provisions of the this SMP shall apply.</p>	<p>It's recommended the county ensure the SMP incorporates recent legislative changes. The provisions in RCW 90.58.355, which list those things that require no local review or approval under the Shoreline Management Act, are not addressed anywhere in the SMP. Adding a reference to this section is suggested.</p> <p>County requested revision.</p>
61	<p>7.03 Application – Notices Page 112</p>	<p>C. The Shoreline Administrator shall provide notice by at least one of the following noticing methods:</p> <ol style="list-style-type: none"> 1. Mailing of the notice to the latest recorded <u>most recent</u> real property owners <u>within 300 feet of the property boundary of the subject proposal</u> as shown by the records of the Lewis County Assessor within 300 feet of the property boundary of the subject proposal; 	<p>County suggested revision for readability.</p>

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
62	7.05.04 Development Start Pages 116 - 117	D. <u>The date of filing for a shoreline substantial development permit simultaneously transmitted with either a shoreline conditional use permit or variance, or both, is the date Ecology's decision is transmitted to the County.</u>	For consistency with RCW 90.58.140(6)(c), this added provision is recommended.
63	7.08.01 Enforcement Page 119	A. The provisions of LCC 17.25.160 relating to enforcement shall apply to the SMP.	County requested revision. The accompanying change to LCC 17.25 will remove the referenced section.
64	7.09.01 General Administration Page 120	A. The County shall track record all project review actions within shoreline jurisdiction, including shoreline permits and letters of exemption.	County requested edit.
65	7.09.02 Shoreline master program review Pages 120-121	A. The SMP shall be reviewed periodically, at least once every eight years as required by RCW 90.58.080(4)(b) (<u>or as hereafter amended</u>) beginning on or before June 30, 2022 2021 and every eight years thereafter. Amendments shall be made as necessary to reflect changing local circumstances, new information or improved data, and changes in State statutes and regulations. B. As part of a SMP update <u>periodic review</u> , the County shall consider the cumulative impacts of recent development on the ecological functions of the shoreline. As part of this review, t The County should assemble a list of recent permit activities in the shoreline jurisdiction by watershed, including any applications for vegetation clearing, docks, structures, or septic systems, among other items. A brief description of identified impacts and mitigation should be provided as part of the assessment. C. During <u>any</u> this amendment process, the County should use a process that is designed to assure that proposed regulatory or administrative actions do not unconstitutionally infringe upon private property rights. Related to the constitutional takings limitation, a <u>A</u> process established for this purpose is set forth in a publication entitled, State of Washington, <i>Attorney General's Recommended Process for Evaluation of Proposed Regulatory or Administrative Actions to Avoid Unconstitutional Takings of Private Property</i> , first published in February 1992.	County requested revision. Date is revised for consistency with RCW 90.58.080(4)(b)(iii). Recommended edits.
66	8.01 Unlisted words or phrases Page 122	Any word or phrase not defined in SMP Chapter 78 : Definitions that is called into question when administering the SMP shall be defined utilizing the SMA and its implementing rules.	Correction to citation.
67	8.02 Definitions Page 122	Act – The Washington State Shoreline Management Act (SMA) (Chapter 90.58 RCW and WAC 173-27), as amended.	Recommended deletion of the reference to one of Ecology's implementing rules.
68	8.02 Definitions Page 131	Moorage cover - moorage, with or without walls, that has a roof.	In response to a comment from Department of Natural Resources the County has suggested an additional definition.
69	8.02 Definitions Page 134	Recreational Facilities – Facilities such as parks, trails, and pathways, whether public, private or commercial, that provide a means for relaxation, play, or amusement. For the purposes of the SMP, recreational facilities are divided into two categories: A. Water dependent (i.e. – moorage facilities, fishing piers, community docks); and	Recreational facilities include several other subcategories than represented in this definition, i.e. water-enjoyment, water-related and non-water-oriented.

ITEM	SMP PROVISION	BILL FORMAT CHANGES [<u>underline-additions</u> ; striketrough-deletions]	ECOLOGY - DISCUSSION/RATIONALE
		B. Non water dependent (i.e. - sports fields, golf courses, and RV camping).	
70	Global change	Corrections to capitalization of "state" and "federal" throughout the document	County request for editorial consistency.
71	Global change		Final corrections to citations, formatting errors and other general clean up.