

SHORELINE MASTER PROGRAM PERIODIC REVIEW

Periodic Review Checklist

This document is intended for use by counties, cities and towns subject to the Shoreline Management Act (SMA) to conduct the “periodic review” of their Shoreline Master Programs (SMPs). This review is intended to keep SMPs current with amendments to state laws or rules, changes to local plans and regulations, and changes to address local circumstances, new information or improved data. The review is required under the SMA at [RCW 90.58.080\(4\)](#). Ecology’s rule outlining procedures for conducting these reviews is at [WAC 173-26-090](#).

This checklist summarizes amendments to state law, rules and applicable updated guidance adopted between 2007 and 2019 that may trigger the need for local SMP amendments during periodic reviews.

How to use this checklist

See the associated *Periodic Review Checklist Guidance* for a description of each item, relevant links, review considerations, and example language.

At the **beginning of the periodic review**, use the review column to document review considerations and determine if local amendments are needed to maintain compliance. See WAC 173-26-090(3)(b)(i).

Ecology recommends reviewing all items on the checklist. Some items on the checklist prior to the local SMP adoption may be relevant.

At the end of your review process, use the checklist as a final summary identifying your final action, indicating where the SMP addresses applicable amended laws, or indicate where no action is needed. See WAC 173-26-090(3)(d)(ii)(D), and WAC 173-26-110(9)(b).

Local governments should coordinate with their assigned [Ecology regional planner](#) for more information on how to use this checklist and conduct the periodic review.

Prepared By	Jurisdiction	Date
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Row	Summary of change	Review	Action
2019			
a.	OFM adjusted the cost threshold for building freshwater docks	16D.03.07(7) lists \$10,000 as the limit.	Updated the language to match the guidance document.
b.	The Legislature removed the requirement for a shoreline permit for disposal of dredged materials at Dredged Material Management Program sites (<i>applies to 9 jurisdictions</i>)	Does not apply to Yakima County. Per the guidance document, this only applies to nine jurisdictions, not including Yakima County.	No action needed.
c.	The Legislature added restoring native kelp, eelgrass beds and native oysters as fish habitat enhancement projects.	Does not apply to Yakima County. We only reference fish habitat enhancement projects through the RCW. 16D.03.07(15)(d)	No action needed.
2017			
a.	OFM adjusted the cost threshold for substantial development to \$7,047.	16D.03.07(3) lists \$5,000 as the limit.	Updated the code to reflect changes as identified in the Guidance document.
b.	Ecology permit rules clarified the definition of “development” does not include dismantling or removing structures.	16D.02.135 definition of development does not mention dismantling or removing	Added clarification in definition and adding language in minor activities allowed without permit. (16D.03.05) WAC 173-27-030(6).
c.	Ecology adopted rules clarifying exceptions to local review under the SMA.	16D.03.07(16) Listed in exemptions	Removed from exemptions and consolidated into minor activities allowed without permit or exemption. (16D.03.05) The guidance document shows example language to consolidate other changes to the exemptions.
d.	Ecology amended rules clarifying permit filing procedures consistent with a 2011 statute.	16D.03.13(4)(f-j) Discusses appeal periods and mentions the WAC for filing with DOE.	Updated 16D.03.13(4)(f-j) based on language from the Guidance document.
e.	Ecology amended forestry use regulations to clarify that forest practices that only involves	SMP table requires shoreline permitting for forestry uses.	Used language provided in the guidance document to update the following sections:

Row	Summary of change	Review	Action
	timber cutting are not SMA “developments” and do not require SDPs.		16D.01.05(01)(d) – applicability 16D.10.05 Permitting Table 16D.06.24 – Shoreline Development Standards 16D.03.13(2)(a) Review Process
f.	Ecology clarified the SMA does not apply to lands under exclusive federal jurisdiction	16D.01.07 SMP does not apply to federal actions on federal lands.	Updated code to clarify applicability.
g.	Ecology clarified “default” provisions for nonconforming uses and development .	16D.03.26 addresses non-conforming uses and facilities.	This update only applies if there is no nonconforming section. Since our code has this, no action needed. However, this section does define nonconforming uses, structures, and lots. We do not have all of these in the definitions. Updated definitions using guidance document language. They have additional example language in the guidance document (from the RCW) which is clearer than our wording; therefore, 16D.03.26 was cleaned up for ease of use and understanding.
h.	Ecology adopted rule amendments to clarify the scope and process for conducting periodic reviews .	16D does not address the process for periodic reviews.	This is only applicable if our SMP includes language for periodic reviews, which it does not. Therefore, no action is needed.
i.	Ecology adopted a new rule creating an optional SMP amendment process that allows for a shared local/state public comment period.	16D does not address the optional SMP amendment process.	This not addressed in 16D; therefore, no action is needed.
j.	Submittal to Ecology of proposed SMP amendments.	16D does not address the submittal requirements for SMP updates.	No changes needed since we do not address the submittal requirements.
2016			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing structure to	16D.03.07 does not include this exemption	Adding the exemption to the SMP.

Row	Summary of change	Review	Action
	comply with the Americans with Disabilities Act .		
b.	Ecology updated wetlands critical areas guidance including implementation guidance for the 2014 wetlands rating system.	16D.07 uses the outdated wetland guidance	Updated the reference to the new wetland guidance. Further discussion is needed regarding how that will effect implementation of buffers to remain consistent with the CAO.
2015			
a.	The Legislature adopted a 90-day target for local review of Washington State Department of Transportation (WSDOT) projects.	16D does not address special procedures for WSDOT projects – RCW 47.01.485	Added recommended language from the “Periodic Review Checklist Guidance.”
2014			
a.	The Legislature revised the cost threshold for requiring a Substantial Development Permit (SDP) for replacement docks on lakes and rivers to \$20,000 (from \$10,000) .	16D.03.07(7) includes the outdated cost threshold of \$10,000.	Updated Cost Thresholds using Periodic Review Checklist 2019a amounts.
b.	The Legislature created a new definition and policy for floating on-water residences legally established before 7/1/2014.	16D does not address FOWRs. Table 16D.10.05 “Residential Use” identifies “Houseboats and over-water residential uses” as not allowed in any shoreline jurisdiction.	No FOWRs, houseboats, and over-water residential uses allowed, therefore no amendment needed.
2012			
a.	The Legislature amended the SMA to clarify SMP appeal procedures .	16D does not outline provisions for appealing an SMP previously approved by Ecology, only site-specific appeals.	Added appeal language in new 16D.07.15 Chapter.
2011			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved federal wetland delineation manual .	16D.03.18(3)(a) requires wetlands to be delineated in accordance with the state wetland delineation document.	Updated reference to the Army Corps of Engineers wetland delineation and link.
b.	Ecology adopted rules for new commercial geoduck aquaculture .	These rules do not apply to Yakima County as no saltwater shorelines are present.	No action needed.

Row	Summary of change	Review	Action
c.	The Legislature created a new definition and policy for floating homes permitted or legally established prior to January 1, 2011.	16D does not address FOWRs. Table 16D.10.05 “Residential Use” identifies “Houseboats and over-water residential uses” as not allowed in any shoreline jurisdiction.	No FOWRs, houseboats, and over-water residential uses allowed, therefore no amendment needed.
d.	The Legislature authorizing a new option to classify existing structures as conforming .	16D.01.05(1)(a) addresses lots, structures and uses lawfully established before the adoption of the SMP.	Updated under new 16D.06 Chapter.
2010			
a.	The Legislature adopted Growth Management Act – Shoreline Management Act clarifications .	16D.01.01(2) (Title and Authority) references RCW 36.70A.480 and addresses the SMP’s relation to CAO and ULDC, but does not include language indicating that an SMP is effective 14 days from Ecology’s written notice of final action/adoption.	Added language to new 16D.01.09 Section.
2009			
a.	The Legislature created new “relief” procedures for instances in which a shoreline restoration project within a UGA creates a shift in Ordinary High Water Mark.	There is no mention of “relief” or “relief procedures” as a result in shoreline restoration projects shifting the OHWM.	Added language to new 16D.01.03 Applicability Section referencing RCW 90.58.580.
b.	Ecology adopted a rule for certifying wetland mitigation banks .	16D.07.06(1) addresses Ecology’s rule for certifying wetland mitigation banks.	No action needed.
c.	The Legislature added moratoria authority and procedures to the SMA.	16D does not address moratoria authority.	Change not required. No action needed.
2007			
a.	The Legislature clarified options for defining “floodway” as either the area that has been established in FEMA maps, or the floodway criteria set in the SMA.	The definition of “Floodway” in 16D.02.220 does not include the updated ecology definition.	Added “Periodic Checklist Option 1” example language since we use FEMA Floodway maps.
b.	Ecology amended rules to clarify that comprehensively updated SMPs shall include a list and map of streams and lakes that are in shoreline jurisdiction.	16D includes Appendix B (table) which identifies Yakima County Shoreline Lakes/Ponds/Env. Designations and Appendix C	Removed Appendix A Type 2 streams and updated Appendix B & C.

Row	Summary of change	Review	Action
		which identifies Yakima County Shoreline Streams/Env. Designations.	County GIS creating maps of shorelines.
c.	Ecology's rule listing statutory exemptions from the requirement for an SDP was amended to include fish habitat enhancement projects that conform to the provisions of RCW 77.55.181.	16D.03.07 "Exemptions" (15)(d) requires fish habitat enhancement projects to "conform to the provisions of RCW 77.55.181."	No action needed.

Additional amendments

Modify this section, as needed, to reflect additional review issues and related amendments. The summary of change could be about Comprehensive Plan and Development regulations, changes to local circumstance, new information, or improved data.

Two example formats:

SMP section	Summary of change	Review	Action

SMP Section	Summary of change	Discussion

Row #	Section	Comment	Action	Status
1	NS 7.36	The SMP should also have standards addressing public access.	We will be adding public access.	Added.
2	NS 7.92	Landfill section	Landfill was an error. It should have been just fill.	Corrected.
3	Critical Areas Goals and Policies (page 15)	Critical Areas goals are in the SMP.	We will not be including the critical areas goals and policies. Deleting CA goals 8-19.	Deleting CA sections.
4	Purpose statement 8 (page 15)	Critical Areas - Groundwater.	We will not be including the critical areas goals and policies. Deleting CA goals 8-19.	Deleted CA sections.
5	Purpose statement 10-12 (page 17)	Management/regulation of stormwater isn't really a SMA issue.	We will not be including the critical areas goals and policies. Deleting CA goals 8-19.	Deleted CA sections.
6	Goal NS 18 (page 22)	Critical Areas goals.	We will not be including the critical areas goals and policies. Deleting CA goals 8-19.	Deleted CA sections.
7	16D.01.01	Statement in Title and Authority references that 16D is established pursuant to RCW 36.70A.060, which is an incorrect reference.	Change the Authority to reference the SMA	Changed.
8	16D.01.03	This is referenced as a regional SMP	Remove any mention of this being a regional SMP since it isn't truly a regional SMP.	Deleted.
9	16D.01.040(1)(h)	Reasonable Use is listed, which doesn't match the context of the sentence.	Change to Conditional Use provisions.	Changed.
10	16D.01.040(1)(j)	Statement mentions lands outside of shoreline jurisdiction.	Statement mentions lands outside of shoreline jurisdiction. It can be deleted	Deleted.
11	16D.01.040(1)(k)	Mining specific statement that doesn't fit under the Intent of Title section.	This isn't an intent statement. Move to mining section or the use table.	Deleted (not needed). Mining is in the Shoreline Land use Table.
12	16D.01.05	Applicability needs to be updated in accordance with (IAW) checklist 2017F	Addressed in 16D.01.07	Done.
13	16D.01.05	Applicability section is really wordy, lots of unclarity of what this title applies to and what it doesn't. Also, flood chapter mentioned.	Clean up section for clarity and ease of use. Remove mention of flood chapters.	Done.
14	16D.01.07	Clean up (Checklist 2017 f, see WAC 173-27-060).	Updated per checklist.	Done.
15	16D.01.08	The term "appropriate authorities of municipalities" is used. Since this isn't a regional SMP it needs to be specific to Yakima County (with other jurisdictions customizing if they see fit).	Reworded.	Done.
16	16D.01.08	Interpretations - this section does not mention the WAC.	Interpretations was moved under new chapter 16D.07 (applications) and WAC 173-26-140 was referenced.	Done.
17	16D.02.015	Agricultural activities needs to be updated to be consistent with RCW 90.58.065	Update definitions to meet the RCW.	Done.
18	16D.02.015(3)	The last sentence of the Agricultural Land def should be moved to the Ag use section, not quite appropriate in the def.	Deleted - this is covered under nonconforming.	Done.
19	16D.02.033	Aquaculture def doesn't meet WAC. Needs updated to meet WAC 173-26-020.	WAC 173-26-020 Aquaculture definition	Done.
20	16D.02.082	Cabin was distinguished separately from SFR. But most other codes would just consider it a SFR.	Remove cabin and just make it a SFR	Done.

21	16D.02.092	Chief Building Official - we no longer use this term.	Update this definition list as Building Official.	Updated.
22	16D.02.115	Confinement feeding operation - concerns with how this will fit with the correct agricultural definition.	This is covered in the agriculture definition. Updated the CFO to point to Ag and deleted it from the land use table.	Updated.
23	16D.02.135	Development - checklist 2017b updates this. Checklist 2017e? Forest practices timber cutting only is not development	Updated the definition to match the RCW. Included checklist 2017b. Did not include 2017e as that is in 16D.01.05.	Done.
24	16D.02.135	Title 14 is referenced (which is a repealed ordinance).	Updated to Title 19.	Done.
25	16D.02.216	Flood-proofing is highlighted	Cleaned up def.	Done.
26	16D.02.220	Floodway Def - update with WAC 173.26.020 definition	Update with the FEMA definition.	Done.
27	16D.02.225	Floodway fringe is highlighted	Cleaned up def.	Done.
28	16D.02.255	Grading - WAC 173-26-020 definition	Updated Def to meet WAC.	Done.
29	16D.02.281	Lowest Floor Definition	Cleaned up def.	Done.
30	16D.02.284	Manufactured home parks or sub definition - This is a floodplain management definition	Deleted. Will be moved to the new flood chapter.	Done.
31	16D.02.302	New Construction - def references flood chapters	Deleted. Will be moved to the new flood chapter.	Done.
32	16D.02.303	Nonconforming use definition only references the flood chapters.	Updated definition	Done.
33	16D.02.304	Nonconforming structure definition only references the flood chapters.	Updated definition	Done.
34	16D.02.305	OHWM definition needs updates to meet RCW	Update this definition.	Done.
35	16D.02.321	Qualified Professional - update definition	Updated.	Done.
36	16D.02.325	Restore def - update to meet WAC 173.26.020 definition	Updated to meet the definition.	Done.
37	16D.02.360	Shore stabilization - def needs to be updated to include soft stabilization options.	Updated.	Done.
38	16D.02.395	Substantial improvement - 16D.05 is highlighted	Deleted.	Done.
39	16D.02	Water oriented use, water dependent use, water related use, water enjoyment use	Added definitions	Done.
40	16D.02	High, moderate, low intensity uses	Added definitions	Done.
41	16D.03	Abbreviated review alternatives - confusing header	Header removed	Done.
42	16D.03	16D.03.25, 16D.03.26 and 16D.03.27 all listed under permit review criteria, which isn't the best location for these.	16D.03.25 is now amendments to permits and is now 16D.07 , 16D.03.26 is now 16D.06 and is its own chapter, 16D.03.27 was moved to 16D.08.	Done.
43	16D.03.01	Shoreline development authorization required - this section needs to meet WAC 173-26-191	Updated this section in 16D.07	Done.
44	16D.03.01(2)	This statement is for critical areas	Deleted this sentence	Done.
45	16D.03.02	Inquiry and early assistance. This might not be the best location since they are needed for all permits.	Cleaned up these sections (located under 16D.07) and deleted what wasn't necessary.	Done.
46	16D.03.03	Pre-application conference - Not the best location since they are needed for all permits.	Cleaned up these sections (located under 16D.07) and deleted what wasn't necessary.	Done.
47	16D.03.04	Technical assistance conference (this is highlighted)	Cleaned up these sections (located under 16D.07) and deleted what wasn't necessary.	Done.
48	16D.03.05	Abbreviated review alternatives - confusing terms	Cleaned up these sections (located under 16D.07) and deleted what wasn't necessary.	Done.
49	16D.03.05	Checklist 2017c - maybe add section about exceptions. Also address 2017e.	2017c - Added to 16D.07. 2017e - address in 16D.07.18(2)(a)	Done.

50	16D.03.05	Minor Activities allow without a permit - title seems confusing	Renamed to "actions not considered development"	Done.
51	16D.03.06	Remove flood language	Deleted	Done.
52	16D.03.06(12)	This section is confusing. Flood hazard permits are not relevant to the SMP and SMP exemptions should be listed in the appropriate sections.	Deleted this 16D.03.06(12). Does not seem relevant.	Done.
53	16D.03.07	Activities exempt should match statute for order and wording, and update cost thresholds.	Need to fix the order and verify the wording is consistent with the WAC.	Done.
54	16D.03.07(3)	Checklist 2017a	Updated	Done.
55	16D.03.07(6)	Needs to be updated to meet WAC.	Updated the language from WAC 173-27-040	Done.
56	16D.03.07(7)	Checklist 2019a	Updated from the checklist	Done.
57	16D.03.07(10)	WAC 173-270-40(f)	Updated the language from WAC 173-27-040	Done.
58	16D.03.07(12)	RCW 89.08.460 watershed restoration project def.	Updated the language from WAC 173-27-040	Done.
59	16D.03.07(16)	Hazardous - this is not an exemption, it is not required to obtain a permit	Deleted. Moved to new 16D.07.08	Done.
60	16D.03.08	Exemptions for geologically hazardous areas	Deleted section. Under shoreline jurisdiction, either they are not a development (minor activities, no permit), they fall under the exemption, or they have to get a permit.	Done.
61	16D.03.08(3)	Related to comments above, it is either an action that doesn't need a permit or one that does (which may or may not qualify for an exemption)	Deleted. Doesn't follow other Shoreline requirements.	Done.
62	16D.03.10	This mitigation requirements section seems to be based on critical areas. Should be changed for smp. See WAC 173-26-201(2)(e)	Added to new chapter 16D.04.02.	Done.
63	16D.03.11	Section is for the Review process, but seems disconnected from the pre app stuff and review process from previous chapters.	Added to new chapter 16D.07. Added the application requirements.	Done.
64	16D.03.11	Application submittal needs to be consistent with WAC 173-27-180	WAC 173-27-180 has application submittal requirements, just update to match the WAC	Done.
65	16D.03.12 Table 3-1	Variance - doesn't include bulk, dimensional, and performance standards	Added bulk and dimensional to the standards for variance.	Done.
66	16D.03.12 Table 3-1	Non conforming use or facility - these are not and can not be shoreline permits.	Deleted NCUs from this table.	Done.
67	16D.03.12 Table 3-1	Flood hazard permit - again flood related	Deleted from table	Done.
68	16D.03.13	Checklist 2017d	Language added consistent with checklist.	Done.
69	16D.03.13(2)	These uses should be addressed early on	Moved to 16D.07.18.	Done.
70	16D.03.13(2)(a)	Make sure this is updated for forest practices	Updated this section in accordance with the checklist. This has been deleted from this section because it isn't necessary.	Done.
71	16D.03.14	Basis for action - review this section for consistency with WAC 173-27-140 and actual procedures.	Updated this section to only include 7 and 8. Also, included WAC 173-27-140 in 16D.03.13(2).	Done.
72	16D.03.17(13)	Compensatory mitigation plans - not clear when a mitigation plan is needed.	Updated this section - now mitigation sequencing and is located in 16D.04.02. This lists the mitigation required for impacts.	Done.

73	16D.03.17(14)(a)	An "organization with demonstrated capability" is listed as someone who can undertake a mitigation project. This doesn't seem necessary.	Deleted this statement.	Done.
74	16d.03.18(3)	Critical areas report - section not clear. Also update checklist with 2016b.	Updated this section to be more clear and with the checklist 2016b.	Done.
75	16D.03.18(3)(e)	Supplemental Reports - Update with checklist item 2016b and also check reference.	Section updated	Done.
76	16D.03.19	Permit review criteria - meld with other review process sections.	Moved to 16D.07.15. Updated to be consistent with WAC 173-27-150.	Done.
77	16D.03.21	Shoreline conditional use - needs to be consistent with wac 173-27-160	Updated to be consistent with WAC 173-27-160.	Done.
78	16D.03.22	Variance - needs to be consistent with wac 173-27-170	Updated to be consistent with WAC 173-27-170.	Done.
79	16D.03.25	Minor revisions - needs to be consistent with WAC 173-27-100	Change to "Amendments to Permits" and consistent with WAC.	Done.
80	16D.03.26	Nonconforming - this is not a permit, this is a use. This should be its own section. Also, these changes may require an exemption cup sdp or variance.	Nonconforming has been moved to chapter 6.	Done.
81	16D.03.26(30)(c)	Code says NCUs shall meet the decisions criteria for CUPs. But NCUS are uses that are otherwise prohibited. How could a prohibited use meet the CUP criteria?	Updated the nonconforming section.	Done.
82	16D.03.27	General critical areas - is this the best location for this info?	Moved to the general provisions of the critical areas section (now chapter 8).	Done.
83	16D.03.27	General Critical Areas Protective Measure - review to determine if this is how we process this.	Didn't make too many changes to this section.	Done.
84	16D.03.27(2)	Declarative Covenants - do we ever require these	Although we don't do this, it might be good to leave it in the code. It does say may require, so we wouldn't have to do it we choose to keep ignoring it.	Done.
85	16D.03.27(3)	Subdivision standards - are subdivisions development?	Subdivisions are not considered development by the RCW; however, we will keep the language in there. Also deleted floodplain requirements of 3(b)(iii) because these will be in the new flood chapter.	Done.
86	16D.05	16D.05 is an ordinance within an ordinance. This is the Flood chapter that is administered by the Building Official.	Propose to remove this chapter from the SMP	Done.
87	16D.05.20.060	The exemption in the flood chapter isn't a true SMP exemption. Needs to be removed.	Propose to remove this chapter from the SMP	Done.
88	16D.05.32	Floodway fringe uses - this isn't related to the SMP.	Propose to remove this chapter from the SMP	Done.
89	16D.05.32.020	Manufactured home parks is listed as prohibited uses in the floodway fringe areas, which is specific to the flood management, not the SMP.	Propose to remove this chapter from the SMP	Done.
90	16D.05.36	Floodway uses - This is specific to the Flood chapter.	Propose to remove this chapter from the SMP	Done.
91	16D.05.44	Building titles and permits are listed through this whole section, which are not applicable to the SMP.	Propose to remove this chapter from the SMP	Done.

92	16D.05.48	Floodproofing certification - this is flood management specific, not related to the SMP	Propose to remove this chapter from the SMP	Done.
93	16D.05.52	Variances is listed. Is this a variance from shoreline or flood standards? Creates confusion.	Propose to remove this chapter from the SMP	Done.
94	16D.05.52.060	Power to refer decisions. This is a very specific permitting process for shoreline permits, but in the Flood chapter it has a different meaning.	Propose to remove this chapter from the SMP	Done.
95	16D.06.03(4)	Wetlands and FWHCAs are different types of CAs. Need two different locations.	The reorganization might have resolved this comment.	Done.
96	16D.06.07	Ensure consistency with checklist 2016b and does this belong under wetlands?	Moved to new critical areas wetland chapter wetlands section. And the Wetlands section has been updated for consistency with the checklist.	Done.
97	16D.06.10	Title says general development standards. Needs to be more specific for what the development standards are for.	Moved to the critical area chapter fish and wildlife section.	Done.
98	16D.06.11	The first sentence in this section isn't clear what it is applying to.	The purpose and intent of the new CA chapter within the shoreline master program should cover this.	Done.
99	16D.06.11(18)	Archaeological - this standard is missing (check WACs) and that it is in the wrong place since it would apply to everything.	This has been added to the new general regulations chapter, applicable to the whole shoreline jurisdiction.	Done.
100	16D.06.11(24)	Additional general shoreline standards - this title isn't clear.	This is now under fish and wildlife critical areas section. Remove the word additional.	Done.
101	16D.06.12	Critical area development authorization	Moved under fish and wildlife section of the CA chapter. Changed to a shoreline permit.	Done.
102	16D.06.13	Water dependent uses are listed under the wetlands section. Water dependent uses is only applicable to shoreline buffers, not wetland buffers	Move to new chapter 16D.05 shoreline modifications and uses	Done.
103	16D.06.16(2)	There is no mention of buffer averaging and other tools to avoid a variance.	Buffer averaging has been added to the new CA Wetlands chapter.	Done.
104	16D.06.17(12)	Additional standards for roads, etc. - Title needs fixed.	Renamed to Parking and removed 12c.	Done.
105	16D.06.22	Commercial Mining of Gravels - see WAC 173-26-241(h). The SMP should identify where mining may be an appropriate use of the shoreline.	Updated this section to meet the WAC.	Done.
106	16D.06.23	Reclamation	Deleted this section. Reclamation would be included in the permit and this is talked about in section 16D.04.02 (new section for mitigation sequencing).	Done.
107	16D.06.24	Shoreline development standards - Issues with Header title and location.	Moved to the shoreline modification uses section. And the header was deleted.	Done.
108	16D.06.24	Forest Practices.	This section has been updated based on the checklist.	Done.
109	16D.07	Wetlands - it appears there are multiple sections that address wetlands. Maybe one critical area chapter with each CA as a sub text? Or make sure all wetland info is under the wetland chapter.	This chapter has been updated and is located under critical areas. All wetland related sections will be under that chapter.	Done.

110	16D.08.02	Mapping and designation - which geologically hazardous areas, if any, intersect with shoreline designation? Do they all need to be included if there is no intersection?	Due to our time constraints, we will just need to keep these in here. We don't have time to evaluate which geologic hazardous areas intersect with shoreline environments.	Done.
111	16D.10	Shorelines - The header doesn't indicate what is included in this chapter and the information included is located at the end of the SMP, but should be included earlier in the SMP.	Moved to 16D.03	Done.
112	16D.10.03(3)	Shoreline jurisdiction - Yakima County's shoreline jurisdiction is more restrictive than what is required with the SMA.	Made the measurements consistent with RCW 90.58.030(d) in regards to what is considered shorelines jurisdiction.	Done.
113	16D.10.04	Shoreline environments - clean up this section (how they were determined, the purpose and standards). WAC 173-26-211 Purpose, Classification criteria, and management policies.	Followed the preferred order for each environment.	Done.
114	Table 10-1 Shoreline Land Use Table	Header - clean up the language in the header to simplify the table. The language is located elsewhere.	Deleted exemption and nonconforming language.	Done.
115	Table 10-1 Shoreline Land Use Table	Aquaculture - packing is not part of processing, and aquaculture does not include processing.	Changed so that processing is not allowed. Delete packing and storage because it is part of processing.	Done.
116	Table 10-1 Shoreline Land Use Table	Archeological - not sure what the intent is.	Deleted. This isn't needed. We have a section that addresses it. 16D.04.01	Done.
117	Table 10-1 Shoreline Land Use Table	Cabins - Yakima County would consider a cabin a SFR; therefore, we need to resolve the conflict between the two in the table.	Deleted cabins from the table. Also took the opportunity to clean the residential section up.	Done.
118	Table 10-1 Shoreline Land Use Table	Recreation - how are high intensity uses defined	Cleaned up these sections. Added these descriptions into the definition. Removed very-low intensity recreation.	Done.
119	Appendix A	SMP doesn't regulate type 2 streams except for portions within shoreline. This appendix is not really necessary.	This appendix is specific to critical areas; therefore, it is not needed. Let's delete this appendix.	Deleted.
120	SMP Draft 1 section 16D.01.05 Applicability of Permit System to Federal Agencies - pg. 37 2007 adopted SMP Section 16D.01.07	Draft 2 Page No(s). 37-38	Delete. Repetitive and already covered in new 16D.01.03(3) Applicability.	Deleted.
121	16D.02.304 Nonconforming Structure or Development	Draft 2 Page No(s). 62	Change nonconforming date to September 5, 1974.	Changed.
122	SMP Draft 1 assigned section 16D.02.012 Shoreline Administrator	Draft 2 Page No(s). 66-67	Move alphabetically to new section 16D.02.357.	Moved.
123	2007 adopted SMP Section 16D.02.360 Shore Stabilization	Draft 2 Page No(s). 66	Move and renumber as new 16D.02.350 for correct alphabetical order.	Moved and renumbered.
124	16D.03.03 Shoreline Jurisdiction	Draft 2 Page No(s). 75-76	Remove subsections (2), (3), and (5) referencing shoreline jurisdiction beyond 200 ft. of OHWM.	Removed.
125	16D.04.04 through 16D.04.06	Draft 2 Page No(s). 99-103	Scribner's numbering error and skipped over 16D.04.03 section. Renumber.	Renumbered.

126	16D.07.08(7) & (8) Pre-application Site Visit Request 2007 adopted SMP Section 16D.03.03 Pre-application Conference	Draft 2 Page No(s). 15-152	Delete subsections (7) & (8) due to repetitive and confusing language (see row number 147 for more details about previous location in Draft 1). Added last sentence from 16D.08.01.05(2) last sentence concerning "reasonable access" language to new subsection 16D.07.07(7) language.	Deleted, added language, and renumbered.
127	16D.07.13(2) Shoreline Substantial Development Permit	Draft 2 Page No(s). 159	Added WAC 173-27-150 to subsection (2) Review Criteria reference.	Added.
128	16D.07.14(4) Shoreline Conditional Uses	Draft 2 Page No(s). 161	Added WAC 173-27-160 to subsection (4) Review Criteria reference.	Added.
129	16D.07.15(4) Shoreline Variance Permits	Draft 2 Page No(s). 162	Added WAC 173-27-170 to subsection (4) Review Criteria reference.	Added.
130	16D.07.18(2) Review Process	Draft 2 Page No(s). 167	Scribner's error. Shoreline Substantial Development Permit not applicable to this section.	Deleted.
131	16D.08.01.01 Purpose of Title	Draft 2 Page No(s). 178	Purpose of the Chapter, not Title. Delete "Title"	Deleted.
132	16D.08.01.02 Intent of Title	Draft 2 Page No(s). 178	Intent of Chapter, not Title. Delete "Title."	Deleted.
133	16D.08.01.02(1)	Draft 2 Page No(s). 178	Changed to say "critical areas associated with shorelines regulated under the provisions of this Title," not under GMA and RCW 86.16.	Corrected.
134	16D.08.01.02(1)(g)	Draft 2 Page No(s). 179	Delete GMA and NFIP to only say "Implement the goals and requirements of the SMA."	Deleted.
135	16D.08.01.02 original subsection (1)(g)	Draft 2 Page No(s). 179	Delete. "Recognize and protect private property rights" already stated in 16D.03.01(4) Purpose and Intent, pg. 75.	Deleted.
136	16D.08.01.02(i)	Draft 2 Page No(s). 179	Reject Deletion. Ok to point out "no net loss of ecological function within shoreline."	Reject deleting.
137	SMP Draft 1 subsection 16D.08.01.03(1) Applicability 2007 adopted SMP subsection 16D.01.05(1)	Draft 2 Page No(s). 180	Delete subsection (1). Details covered under new subsection 16D.01.03(1), pg. 35.	Deleted.
138	SMP Draft 1 subsections 16D.08.01.03 (1)(a)(i)-(iv) 2007 adopted SMP subsections 16D.01.05(1)(a)(i)-(iv)	Draft 2 Page No(s). 180	Move SMP adoption and amendment dates to new subsection 16D.01.03(8) Applicability subsections i-iii, pg. 36 - 37. Added "Yakima County SMP adopted date 12/18/2007. Delete subsections (iv-vii) 16C CAO adoption and amended dates.	Moved and deleted.

139	SMP Draft 1 subsections 16D.08.01.03(1)(b) & (c) 2007 adopted SMP subsections 16D.01.05(1)(b) & (c)	Draft 2 Page No(s). 180	Delete. (b) SMP not concerned with critical areas outside of shoreline. New subsection 16D.01.03(2), pg. 36, states that federal agency may require other permitting requirements. New subsection 16D.01.03(3), pg. 36, covers federal lands permitting requirements.	Deleted.
140	SMP Draft 1 subsection 16D.08.01.03(1)(d) 2007 adopted SMP subsection 16D.01.05(1)(d)	Draft 2 Page No(s). 180-181	Delete. Forest Practices covered under new section 16D.05.07 Forest Practices, pg. 113, with new required language.	Deleted.
141	SMP Draft 1 subsection 16D.08.01.03(1)(e) 2007 adopted SMP subsection 16D.01.05(1)(e)	Draft 2 Page No(s). 181	Move to new subsection 16D.05.02(3), pg. 108, as second half of first sentence.	Moved
142	SMP Draft 1 subsection 16D.08.01.03(1)(f) 2007 adopted SMP subsection 16D.01.05(1)(f)	Draft 2 Page No(s). 181	Delete. Change of agricultural crops already covered under 16D.02.015 AG definition, pg. 44 - 45, 16D.05.02 Agriculture Use, pg. 107 - 108, and 16D.07.06(5), pg. 142 - 143.	Deleted.
143	SMP Draft 1 subsection 16D.08.01.03(1)(g) 2007 adopted SMP subsection 16D.01.05(1)(g)	Draft 2 Page No(s). 181	Delete. Covered under new section 16D.07.04 Minor Activities Allowed without a Permit, pg. 136 - 137.	Deleted.
144	SMP Draft 1 subsection 16D.08.01.03(1)(h) 2007 adopted SMP subsection 16D.01.05(1)(h)	Draft 2 Page No(s). 181	Delete. Covered under new subsection 16D.01.03(4) Applicability, pg. 36.	Deleted.
145	SMP Draft 1 subsection 16D.08.01.03(2) 2007 adopted SMP subsection 16D.01.05(2)	Draft 2 Page No(s). 181	Delete. Covered under new subsection 16D.07.12(4) Application Requirements, pg. 158.	Deleted.
146	SMP Draft 1 section 16D.08.01.04 Shoreline Development Authorization Request 2007 adopted SMP Section 16D.03.01	Draft 2 Page No(s). 181-182	Delete. Covered under new subsection 16D.01.03(4) Applicability, pg. 36.	Deleted.
147	SMP Draft 1 section 16D.08.01.05 Pre-application Site Visit Request and Critical Area Report Requirements 2007 adopted SMP section 16D.03.02 Critical Area Identification Form and Critical Area Report Requirements	Draft 2 Page No(s). 152	Move 16D.08.01.05 to new section 16D.07.09 for procedural flow and rename it "Critical Areas Review Requirements." Delete Subsections 16D.08.01.05(1) & (2) due to repetitive language as found in 16D.07.08, pg. 151-152. Retained subsection (3) for procedural requirements with critical areas report requirements.	Moved, renamed, and deleted.
148	SMP Draft 1 section 16D.08.01.06 Pre-Application Conference 2007 adopted SMP Section 16D.03.04 Technical Assistance Conference	Draft 2 Page No(s). 182-183	Delete. We primarily conduct site visits if necessary. Repetitive language of process and procedures from new sections 16D.07.08 Pre-application Site Visit Request and 16D.07.09 Critical Areas Review Requirements, pg. 151-154.	Delete.

149	SMP Draft 1 section 16D.08.01.07 Minor Activities Allowed without a Permit or Exemption. 2007 adopted SMP Section 16D.03.05	Draft 2 Page No(s). 136-137	Moved to new section 16D.07.04 as it previously existed in the 2007 SMP section before section 16D.03.06 Exemption - Procedural Requirements.	Moved.
150	SMP Draft 1 section 16D.08.01.08 Application Submittal 2007 adopted SMP Section 16D.03.11	Draft 2 Page No(s). 183-184	Delete. This section is covered under new section 16D.07.12 Application Requirements, pg. 156-159.	Deleted.
151	SMP Draft 1 section 16D.08.01.09 Determination of Review Process 2007 adopted SMP Section 16D.03.12	Draft 2 Page No(s). 184	Delete. This section is covered under new section 16D.07.12 Application Requirements, pg. 156-159.	Deleted.
152	SMP Draft 1 section 16D.08.01.10 Development Authorization - Review Procedure 2007 adopted SMP Section 16D.03.13	Draft 2 Page No(s). 185-187	Delete entire section due to repetitive language covered under new chapter 16D.07, except for the last three sentences of subsection (2)(b) concerning "rangeland livestock grazing actions." Move to new subsection 16D.05.02(3) Agriculture, pg. 108.	Moved and deleted.
153	SMP Draft 1 section 16D.08.01.11 Authorization Decisions - Basis for Action 2007 adopted SMP section 16D.03.14	Draft 2 Page No(s). 154-155	Move to new section 16D.07.10 for procedural flow and requirements.	Moved and renumbered.
154	SMP Draft 1 section 16D.08.01.12 Conditional Approval of Development Authorization 2007 adopted SMP section 16D.03.15	Draft 2 Page No(s). 155	Move with section above as renumber as Section 16D.07.11 for procedural flow and requirements.	Moved and renumbered.
155	SMP Draft 1 section 16D.08.01.13 Fees and Charges 2007 adopted SMP section 16D.03.16	Draft 2 Page No(s). 188	Delete. Covered under Subsection 16D.07.01(1)(i) Shoreline Administrator Roles and Responsibility, pg. 134.	Deleted.
156	16D.08.02.09(1) Vegetative Buffers		Shoreline Vegetative Buffer should be mentioned in a couple different sections for clarity. Add 100-foot shoreline vegetative buffer to new subsection 16D.03.03(5) Shoreline Jurisdiction, pg. 75-76.	Added.
157	16D.08.04.03 Geologically Hazardous Areas Protection Approach	Draft 2 Page No(s). 244-245	Check Building references. Email sent to the BLD Division. Feedback was to update ASCE-24-98 to ASCE-24-14.	References updated.
158	16D.07.19.01 Appeals of Shoreline Administrator Determination and Decisions 16D.07.19.02 Appeals to Shorelines Hearings Board	Draft 2 Page No(s). 167-169	Clarify SDP, Shoreline Exemption, Shoreline CUP & VAR appeal process. SDP and exemption to Hearing Examiner and then SHB. Shoreline CUP and VAR directly to SHB.	Clarified.
159	Entire Document		Remove GMA and BAS. Removed GMA from 16D.07.20 SMP Amendments Subsections (3) and (5).	Deleted where necessary.

160	Entire Document		This SMP has been reorganized using existing and new language for readability. Accept all track moves.	Accepted.
161	Entire Document		Check references and justify.	Renumbered sections due to relocating sections from the critical areas chapter.
162	Entire Document		Review and renumber title chapters, sections, and subsections.	Renumbered.
163	Entire Document		Update Table of Contents.	Completed.
164	Section 16D.05.09(4)(c) and Table 16D.03.05-1 Shoreline Land Use Table - "Commercial and Community Service Uses" and "Industrial."	Why require a setback from "either a public right of way or 100'+ of a separate parcel?" Yakima County has always applied 100'	Delete "either a public right of way" and "+ of a separate parcel."	Deleted.