

Gap Analysis Report

Shoreline Master Program Selah, Washington

April 2020
Revised July 2020



Prepared on behalf of:

For: City of Selah
Planning Department
222 S. Rushmore Road
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The Watershed Company Reference Number:

190936



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1. Introduction

This document presents the results of the City of Selah (City) Shoreline Master Program policy and regulatory gap analysis. In accordance with the Washington State Shoreline Management Act (SMA), local jurisdictions with shorelines of the state are required to conduct a periodic review of their Shoreline Master Programs (SMPs) (WAC 173-26-090). This review is intended to keep SMPs current with amendments to state laws and rules, changes to local plans and regulations, changes in local circumstances, and new or improved data and information.

The city regulates shoreline management along portions of the Naches and Yakima Rivers and through the Yakima County Regional Shoreline Master Program, enacted February 2010. It is anticipated Selah may expand their urban growth area sometime in the near future. The following evaluation, follow-up regulation amendments and shoreline environment mapping will be cognizant of this ongoing City's project.

As a first step in the periodic review process, The Watershed Company (Watershed) reviewed the current SMP for consistency with legislative amendments by the state made since its last adoption. Watershed staff also reviewed the current SMP for consistency with the policies in the City's Comprehensive Plan, updated under a periodic review in 2017 (Ordinance 2019). Both the current SMP and the updated Comprehensive Plan, clearly establish the goals and policies of the SMA. No gaps in consistency between the two documents were identified. Therefore, no comprehensive plan amendments are required for this SMP Periodic update.

Finally, the periodic review process represents an opportunity to remove extraneous elements and language that are not relevant to the City that are from the County's regional comprehensive SMP update. Ultimately, streamlining the document for City staff and applicants.

The purpose of this gap analysis report is to provide a summary of this review and to inform updates to the SMP. The report is organized into the following sections according to the content of the review:

- **Section 2** identifies gaps in the SMP's consistency with legislative amendments. This analysis is based on a list of amendments between 2007 to present, as summarized by the Washington State Department of Ecology (Ecology) and provided to the City as a Periodic Review Checklist.

- **Section 3** identifies gaps in consistency the City’s SMP critical areas regulations with current Ecology guidance. The city’s critical area regulations are not incorporated by reference in the current SMP.
- **Section 4** identifies gaps in consistency with the City’s Comprehensive Plan, and with implementing sections of the City’s development regulations other than the CAO.
- **Section 5** identifies other issues to consider as part of the periodic update process, including those issues identified by City staff and residents regarding document usability and redundant regional SMP policies.

This report includes several tables that identify potential revision actions. Where potential revision actions are identified, they are classified as follows:

- **“Mandatory”** indicates revisions that are required for consistency with state laws.
- **“Recommended”** indicates revisions that would improve consistency with state laws, although they are not strictly required.
- **“Optional”** indicates revisions that represent ways in which the City could elect to amend its SMP in accordance with state laws, but that are not required or recommended for consistency with state laws.

This document attempts to minimize the use of abbreviations; however, a select few are used to keep the document concise. These abbreviations are compiled below in Table 1.

Table 1. Abbreviations used in this document.

Abbreviation	Meaning
CARs	Critical Areas Regulations
CAO	Critical Area Ordinance
City	City of Selah
County	Yakima County
Ecology	Washington State Department of Ecology
FEMA	Federal Emergency Management Agency
RCW	Revised Code of Washington
SMP	Shoreline Master Program
WAC	Washington Administrative Code
SMC	Selah Municipal Code
SED	Shoreline Environment Designation

Update

2. Consistency with Legislative Amendments

Table 2 summarizes mandatory and recommended revisions to the Selah SMP based on the review of consistency with legislative amendments made since SMP adoption. In general, mandatory changes to the SMP are minor in nature. These amendments address revised rules regarding SMP applicability, including updated exemption thresholds and definitions. Ecology has also developed new guidance on regulating nonconforming uses, structures, and development that may be useful for the City to clarifying the nonconformance regulations in its SMP (Item 2017g below). Note that section numbers may be updated during the revision process. The section numbers listed in the Table below may differ from those in proposed updates to the SMP. Topics are organized chronologically by year.

Table 2. Summary of consistency with amendments to state laws and potential revisions.

Row	Summary of change	Review	Action
2019			
a.	Washington State Office of Financial Management (OFM) adjusted the cost threshold for building freshwater docks	SMP Section 16.D.03.07.7 includes an outdated cost threshold.	<p>Mandatory: The City may add the following threshold dollar figure for when an SDP is triggered for freshwater docks:</p> <p><u>In fresh waters the fair market value of the dock does not exceed:</u></p> <p>a. <u>twenty-two thousand five hundred dollars (\$22,500) for docks that are constructed to replace existing docks, are of equal or lesser square footage than the existing dock being replaced; or</u></p> <p>b. <u>Eleven thousand two hundred (\$11,200) dollars for all other docks constructed in fresh waters. However, if subsequent construction occurs within five years of completion of the prior construction, and the combined fair market value of the subsequent and prior construction exceeds the amount specified above, the subsequent construction shall be considered a substantial development for the purpose of this chapter.</u></p>
b.	The Legislature removed the requirement for a shoreline permit for	There are no DMMP sites on the shoreline. Therefore, this legislative amendment does not apply.	No action necessary

Commented [AP1]: Updated language added to 16D.03.09(7).

Row	Summary of change	Review	Action
	disposal of dredged materials at Dredged Material Management Program (DMMP) sites		
c.	The Legislature added restoring native kelp, eelgrass beds and native oysters as fish habitat enhancement projects.	SMP 16D.03.07.15 references fish habitat projects, including reference to RCW 77.55.181, capturing the legislative update.	No action necessary
2017			
a.	OFM adjusted the cost threshold for substantial development to \$7,047.	SMP 16D.03.07.3, Exemptions for Hydrologically Related Critical Areas Wetlands and Shorelines, references the out of date dollar figure, as well as the RCW reference, which adjusts automatically for inflation:	Recommended: The City will reference the updated dollar figure, in addition to leaving the existing RCW reference for future updates.
b.	Ecology permit rules clarified the definition of “development” does not include dismantling or removing structures.	The current SMP definition for development does not include the amended rule (SMP 16D.02.135, Definitions):	Recommended: The City to add the following Ecology recommended language to the ‘Development’ definition: <u>“Development” does not include dismantling or removing structures if there is no other associated development or re-development.</u>
c.	Ecology adopted rules clarifying exceptions to local review under the SMA.	SMP Section 16.D.03.05 does not include the updated exceptions.	Recommended: Add Ecology’s suggested language to address exceptions to local review.
d.	Ecology amended rules clarifying permit filing procedures consistent with a 2011 statute.	SMP Chapter 16D.03, Application and Review Procedures, do not describe the filing process. The SMP was updated in 2010 prior this legislative update.	Recommended: Modify language for consistency with Ecology’s recommended language. The City will consider updating SMP Chapter 16D.03 to describe that all shoreline permits adhere to the date of filing with Ecology, pursuant to WAC 173-27-130.
e.	Ecology amended forestry use regulations	City contains limited forested lands, that if cleared would	No action necessary

Commented [AP2]: Ecology’s suggested language added to definition of “Development” in 16D.02.135.

Commented [AP3]: Ecology’s suggested language added as Section 16D.03.07.

Commented [AP4]: Removed 16D.01.05(1)(d).

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Row	Summary of change	Review	Action
	to clarify that forest practices that only involves timber cutting are not SMA “developments” and do not require SDPs.	not trigger a Class IV Forest Practices Permit (lands converted to another use/not likely reforested due to conversion to urban development.	
f.	Ecology clarified the SMA does not apply to lands under exclusive federal jurisdiction	Selah may contain Federal lands.	<p>Recommended: Add new language to SMP, using Ecology’s model language:</p> <p><i>‘Areas and uses in those areas that are under exclusive federal jurisdiction as established through federal or state statutes are not subject to the jurisdiction of chapter 90.58 RCW.’</i></p>
g.	Ecology clarified “default” provisions for nonconforming uses and development .	SMP Chapter 16D.02, provides definitions for “nonconforming use” and “nonconforming structure”. City has adopted tailored provisions during last update.	<p>Recommended: The city should consider updating language to include, Definitions, for “nonconforming development” and “nonconforming lots” (SMP Chapter 16D.02).</p>
h.	Ecology adopted rule amendments to clarify the scope and process for conducting periodic reviews .	This is optional and the current SMP does not address the periodic review provision.	No action necessary
i.	Ecology adopted a new rule creating an optional SMP amendment process that allows for a shared local/state public comment period.	The SMP does not address the amendment process nor is it required to.	No action necessary
j.	Submittal to Ecology of proposed SMP amendments.	This is optional and the SMP does not currently address the amendment process amendment routing requirements pursuant to the requirements of WAC 173-26.	No action necessary

Commented [AP5]: Language added to 16D.01.06(1).

Commented [AP6]: Definitions for the following updated and/or added as 16.02.302 - .304:

- “Nonconforming Development or Structure”
- “Nonconforming Use”
- “Nonconforming Lot”

Row	Summary of change	Review	Action
2016			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing structures to comply with the Americans with Disabilities Act (ADA) .	The SMP does not address the ADA exemption in Section 16D.03.07.	Recommended: Add new exemption to SMP, using Ecology's recommended language: <i><u>'The external or internal retrofitting of an existing structure with the exclusive purpose of compliance with the American with Disabilities Act of 1990 or to otherwise provide physical access to the structure by individuals with disabilities.'</u></i>
b.	Ecology updated wetlands critical areas guidance including implementation guidance for the 2014 wetlands rating system.	Yakima County Regional SMP references outdated 2004 manual for Eastern Washington. Note: The City updated their CAO in 2017 referencing the most current 2014 manual. The City desires to reference the most current CAO.	Mandatory: Update the SMP to include reference to the City's most recent CAO. Exceptions that shall not apply in shoreline jurisdiction will need to be noted in the SMP. See Section 3 below for further details.
2015			
a.	The Legislature adopted a 90-day target for local review of Washington State Department of Transportation (WSDOT) projects.	The SMP does not address this.	Optional: Consider amending SMP to define special procedures for WSDOT projects per WAC 173-27-125.
2014			
a.	The Legislature created a new definition and policy for floating on-water residences legally established before 7/1/2014.	The SMP is silent on floating on-water residences. – There are no floating on-water residences in the City of Selah, therefore no amendment is required.	No action necessary
2012			
a.	The Legislature amended the SMA to clarify SMP appeal procedures .	The current SMP does not address appeal procedures. This procedure is already outlined in the WAC.	No action necessary

Commented [AP7]: Ecology's suggested language added as 16D.03.09(18).

Commented [AP8]: Ecology's recommended language added as 16D.03.08.

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Row	Summary of change	Review	Action
2011			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved federal wetland delineation manual .	SMP 16D.03.18.3 contains outdated wetland delineation manual reference.	Mandatory: Strikeout existing language and replace with Ecology example language, reducing the need for future SMP language updates: <i>Identification of wetlands and delineation of their boundaries shall be done in accordance with the approved federal wetland delineation manual and applicable supplements pursuant to the City of Selah's critical areas ordinance.</i>
b.	Ecology adopted rules for new commercial geoduck aquaculture .	City contains freshwater shoreline only, this rule is not applicable.	No action necessary
c.	The Legislature created a new definition and policy for floating homes permitted or legally established prior to January 1, 2011.	SMP prohibits floating homes and houseboats by omission as a permitted use in SMP Chapter 16D.05.32, Floodway Fringe Uses. No floating homes legally established prior to January 1, 2011.	No action necessary
d.	The Legislature authorized a new option to classify existing residential structures as conforming.	The SMP does not classify existing non-conforming residential structures as conforming.	Optional: The City may consider whether to exercise the option to clearly classify existing legally established residential structures as conforming even if they do not meet dimensional standards for setbacks, buffers, height, density, etc. Appurtenant structures are included, but bulkheads and other shoreline modifications and over-water structures are excluded.
2010			
a.	The Legislature adopted Growth Management Act – Shoreline Management Act clarifications .	Regional SMP adopted in 2010 by County Board of Commissioners prior to law going into effect. City-wide critical areas regulations have not been adopted by reference in the SMP.	Recommended: Revise relevant sections in SMP, to clarify effective date of amendments shall be 14 days from Ecology's written notice of final action.

Commented [AP9]: Revisions made to 16D.03.19(3)(a).

Commented [AP10]: Clarifying language about the effective date of the SMP added as 16D.01.09.

Row	Summary of change	Review	Action
Yakima County Regional Shoreline Master Program, Ord. Nos. 13-2007 and 14-2007, effective February 2010			
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.	SMP does not address such relief procedures.	Recommended: Update relief procedure for shoreline restoration projects within a UGA by referencing (WAC 173-27-215) or use following Ecology example language: <i>The City may grant relief from shoreline master program development standards and use regulations resulting from shoreline restoration projects within urban growth areas consistent with criteria and procedures in WAC 173-27-215.</i>
b.	Ecology adopted a rule for certifying wetland mitigation banks .	The SMP Section 16D.07.06 authorizes certified mitigation banks.	No action necessary
c.	The Legislature added moratoria authority /procedures to the SMA.	Yakima County Regional SMP does not address moratoria authority. This procedure is already outlined in the WAC.	No action necessary
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.	Floodway is defined in SMP Section 16D.02.220 and does not include legislation clarifications related to the SMP and elected use of FEMA maps to define floodways in the city.	Mandatory: Remove and replace existing definition to: <u>"Floodway" means the area that has been established in effective federal emergency management agency flood insurance rate maps or floodway maps. The floodway does not include lands that can reasonably be expected to be protected from flood waters by flood control devices maintained by or maintained under license from the federal government, the state or a political subdivision of the state.</u>
b.	Ecology amended rules to clarify that comprehensively updated SMPs shall	No new shoreline waterbodies identified since 2010 SMP update. However, SMP not explicit on shorelines located	Mandatory: List Naches and Yakima Rivers in SMP introduction. Add map of shorelines of

Commented [AP11]: Ecology's suggested language added as 16D.10.03(8).

Commented [AP12]: Updated definition for "Floodway" in 16D.02.220 for consistency with the SMA.

Update

<i>Row</i>	<i>Summary of change</i>	<i>Review</i>	<i>Action</i>
	include a list and map of streams and lakes that are in shoreline jurisdiction.	in City as City adopted Regional County SMP.	the state to a map with corresponding SEDs. Optional: Remove all shorelines listed in Regional SMP not in Selah.
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.	SMP Section 16D.03.07.15.d lists a fish habitat enhancement exemption.	No action necessary

Commented [AP13]: Removed.

3. Integration & Consistency of Critical Areas Ordinance

The City currently regulates critical areas within shoreline jurisdiction through critical areas regulations (CARs) embedded within the Yakima County Regional SMP. These shoreline critical areas regulations are based upon the Yakima County CAO which was last updated in 2007. Since the time of SMP adoption in 2010, the City prepared a city-specific CAO, SMC Chapter 11.50, last adopted in 2017 under Ord. No. 2019. While the City's CAO was prepared in accordance with Ecology Publication #14-06-030, some references to the 2004 wetland rating system remain (albeit these references likely remain unintentionally). It is recommended that the City adopt the City's CAO by reference, but with some minor adjustments. This is discussed further below.

Table 3 below summarizes issues to be resolved in order to incorporate the City's CAO into the updated SMP. The table is organized by critical areas subject area and general actions for CAO regulations implemented on the shoreline.

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Table 3. Summary of gaps in consistency with current critical areas regulations and associated recommended SMP revisions.

#	Issue	Relevant Location(s) ¹	Review & Action
Applicability			
1	Critical Areas	SMP Chapters 16D.06 - 16D.09	<p>Review: The Yakima County Regional SMP currently includes critical areas regulations embedded in the SMP. The City of Selah's Critical Areas Ordinance (CAO), is codified in SMC 11.50. This CAO could be incorporated by reference in to the SMP for consistency throughout the City.</p> <p>Action: Recommended: Delete CAR sections and cross-references in the Yakima County Regional SMP; add new cross reference to SMC 11.50, with exceptions. Note, certain CAO provisions (e.g. Reasonable Use Exceptions) are not allowed under Ecology's Guidelines.</p>
Wetlands			
2	Wetland Rating System	SMC 11.50.130.a.1-4 SMP Chapter 16D.06 - 16D.07	<p>Review: The City's current CAO correctly references Ecology's wetland rating system: "Washington State Wetlands Rating System for Eastern Washington, publication no. 14-06-030, or as updated or amended." However, the corresponding wetland categorization still references a scoring system from 2004.</p> <p>Action: Mandatory: Revise current wetland rating system reference the 2014 categorization system.</p> <p>Recommended:</p>

Commented [AP14]: Removed several sections from the SMP.
 Added CAO reference as 16D.01.05(3).

Commented [AP15]: Several revisions made throughout 11.50.130 to capture this update.

			Add buffer width/habitat score reference table per Ecology guidance.
3	Wetland Buffers	SMC 11.50.130 <u>Current SMP:</u> SMP Chapter 16D.07	Review: Ecology modified wetland buffer guidance again in 2018. The City currently uses a simplified wetland buffer system. The City's existing wetland buffers are at the upper end of the Ecology guidance. However, without a clearer mechanism to allow buffer reduction, lowering the buffer values may not be supported by Best Available Science. Action: <u>Recommended:</u> Revise wetland buffer provisions in the City-wide CARs to be consistent with current Ecology guidance related to habitat scores and wetland buffers. Consider use of specific impact minimization measures to reduce buffers.
¹ This column attempts to capture the primary relevant location(s) of content related to the item described in the Summary of Change column; however, due to length of the SMP, all relevant locations may not be listed.			

Commented [AP16]: Updated buffer table, consistent with Ecology guidance, provided in 11.50.130(c)(1).

Commented [AP17]: Updated buffer table, consistent with Ecology guidance, provided in 11.50.130(c)(1).

Adopting the City's Critical Areas Ordinance (SMC 11.50) by Reference

The City anticipates referencing the current City-wide critical areas regulations in the updated SMP pursuant to Table 3 recommendations. However, the Shoreline Management Act (SMA) may preclude or alter the administration of certain regulations within the CAO. For example, certain activities exempted under the CAO will not qualify for exemption under the SMP and reasonable use criteria contained in critical areas regulations do not apply within shoreline jurisdiction. In addition, activities allowed without permits under the CAO may require permits under the SMP. Overall the SMA retains more prescriptive standards for 'no net loss' along shorelines.

Wetland Rating/Buffer Widths

SMC Chapter 11.50 refers to the "Washington State Wetlands Rating System for Eastern Washington, Publication No. 14-06-030, or as updated or amended." Ecology updated this rating system in July of 2018 to recalibrate wetland buffers. As such, the City's wetland buffer

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categorization is out of date. Updating the categorization system to be consistent with Ecology’s recommendations could offer the City greater development flexibility. A comparison between the City’s current wetland buffers and Ecology’s 2018 recommendation is included in Table 4 below.

Table 4. Current SMC 11.50.130.c.1 and Ecology’s 2018 Rating System Buffer Widths

Wetland Category	City Current CAO Wetland Buffers	2018 Rating System (ft) ^{1,2}
I	250	100-250
II	200	100-200
III	150	80-200
IV	50	50

¹Range of wetland buffers is dependent upon wetland type and habitat score

²Buffers assume impact minimization measures are not included (see discussion below)

While the City’s CAO was updated in 2017, the wetland categorization in SMC 11.50.130 continues to include the numerical system established in Ecology’s 2004 wetland rating system (now outdated). In 2014, Ecology substantially updated the wetland rating system. The substantive changes from 2004 to 2014 included 1) the use of a High, Medium, or Low ranking for each function instead of numeric scores; and 2) the opportunity section was replaced with two new sections: landscape potential and value. The shift to a High, Medium, Low ranking scheme was prompted by a statistical analysis of wetland rating data, which indicated that the rapid-assessment wetland rating tool is not scientifically accurate beyond a qualitative ranking. As a result of this change, the total point range changed from 0-100 to 9-27 (Hruby 2014), with nine possible points each for water quality, hydrologic, and habitat functions (i.e., ‘habitat scores’).

2018 Ecology Wetland Buffer Guidance

In July 2018, Ecology again updated its guidance for wetland buffers. The change in guidance is the result of Ecology’s continued evaluation of the 2014 wetland rating system as it relates to the 2004 wetland rating system. The updated guidance provides alternatives to buffer tables based solely on wetland category to provide a balance of predictability and flexibility while being easy to use and protecting wetland functions and values. The preferred alternative includes variable

buffer widths based on wetland category and habitat score, according to the updated rating system, as shown in Table 5 below. While the updated guidance does allow for continuing the practice of applying wetland buffers based solely on wetland category, this option provides the least flexibility, as buffers must be large enough for each category to protect the most sensitive wetlands from the most damaging impacts. Likewise, the updated guidance includes alternatives for variable buffer widths based on the intensity of adjacent land use.

Changes to the 2014 Ecology rating system are *recommended* although it is *not mandatory* by Ecology at this time. Table 5 below summarizes issues the new table proposed for the City’s CAO Wetland Section from Ecology’s 2018 Wetland Guidance document for Eastern Washington.

Table 5. Wetland Table with Habitat Scores without mitigation measures/protected corridors

Wetland Category	Buffer width (in feet) based on habitat score		
	3-5	6-7	8-9
Category I: Based on total score	100	150	200
Category I: Forested	100	150	200
Category I: Bogs and Wetlands of High Conservation Value	250 (buffer width not based on habitat scores)		
Category I: Alkali	200 (buffer width not based on habitat scores)		
Category II: Based on total score	100	150	200
Category II: Vernal pool	200 (buffer width not based on habitat scores)		
Category II: Forested	100	150	200
Category III (all)	80	150	200
Category IV (all)	50		

Ecology does provide for even smaller wetland buffers if impact minimization measures are used. The smaller buffers are provided in Table 6 below and the list of impact minimization measures are provided in Table 7.

Update

Table 6. Wetland Table with Habitat Scores with mitigation measures/protected corridors

Wetland Category	Buffer width (in feet) based on habitat score		
	3-5	6-7	8-9
Category I: Based on total score	75	110	150
Category I: Forested	75	110	150
Category I: Bogs and Wetlands of High Conservation Value	190 (buffer width not based on habitat scores)		
Category I: Alkali	150 (buffer width not based on habitat scores)		
Category II: Based on total score	75	110	150
Category II: Vernal pool	150 (buffer width not based on habitat scores)		
Category II: Forested	75	110	150
Category III (all)	60	110	150
Category IV (all)	40		

Table 7. Required measures to minimize impacts to wetlands

Disturbance	Required Measures to Minimize Impacts
Lights	<ul style="list-style-type: none"> • Direct lights away from wetland
Noise	<ul style="list-style-type: none"> • Locate activity that generates noise away from wetland • If warranted, enhance existing buffer with native vegetation plantings adjacent to noise source • For activities that generate relatively continuous, potentially disruptive noise, such as certain heavy industry or mining, establish an additional 10' heavily vegetated buffer strip immediately adjacent to the outer wetland buffer
Toxic runoff	<ul style="list-style-type: none"> • Route all new, untreated runoff away from wetland while ensuring wetland is not dewatered • Establish covenants limiting use of pesticides within 150 ft of wetland • Apply integrated pest management
Stormwater runoff	<ul style="list-style-type: none"> • Retrofit stormwater detention and treatment for roads and existing adjacent development • Prevent channelized flow from lawns that directly enters the buffer • Use Low Intensity Development techniques (for more information refer to the drainage ordinance and manual)
Change in water regime	<ul style="list-style-type: none"> • Infiltrate or treat, detain, and disperse into buffer new runoff from impervious surfaces and new lawns
Pets and human disturbance	<ul style="list-style-type: none"> • Use privacy fencing OR plant dense vegetation to delineate buffer edge and to discourage disturbance using vegetation appropriate for the ecoregion; • Place wetland and its buffer in a separate tract or protect with a conservation easement
Dust	<ul style="list-style-type: none"> • Use best management practices to control dust

Update

4. Comprehensive Plan, Development Regulation and Code Consistency

The City of Selah Comprehensive Plan does not include a Shoreline Element Chapter. However, references to the SMP and the document authority are included in the Natural Systems, Land Use and Administration Elements of the Comprehensive Plan and SMC subsection SMC 10.28, Permitted, Administrative and Conditional Uses. A review of the current SMP was conducted to ensure consistency with the Comprehensive Plan updated in 2017. No changes to the SMP were identified at this time for consistency with the comprehensive plan.

5. Other Issues to Consider

In addition to the issues discussed in the previous sections of this report, several other issues in the current SMP or SMC could be addressed as part of the periodic update process to produce more effective SMP regulations and document administration. These other issues, including items noted by City of Selah staff, are described in Table 8 below.

Table 8. Other issues that could be addressed to produce a more effective SMP.

#	Issue	Relevant Location(s) ¹	Review & Action
General Standards and Regulations			
1	Remove extraneous/irrelevant sections	Throughout SMP	<p>Review: City requests streamlined SMP document that does not include irrelevant sections or provisions that do not pertain to Selah yet are included in the Yakima County Regional SMP.</p> <p>Action Recommended:</p> <ul style="list-style-type: none"> a) Remove all references to Yakima County Comprehensive Plan Policies b) Strike out critical areas code and all references to the Yakima County Critical Areas Ordinance c) Remove all references to shoreline and areas outside of City limits d) Ensure Selah's proposed urban growth area expansion is captured/elements of SMP stricken are not in UGA
2	SED Mapping	SMP SED Mapping (New Appendix)	<p>Review: City requests mapped SED specific just to the City and UGA in shoreline jurisdiction.</p> <p>Action Recommended: Create new SMP SED map</p>
3	Urban Growth Area Expansion	Throughout SMP	<p>Review: It is anticipated Selah may expand the urban growth area sometime in the near future. This SMP update should be cognizant of this possibility and ensure any code amendments, specifically exclusions of</p>

Commented [AP18]: Many revisions made throughout SMP to remove extraneous and redundant language.

Commented [AP19]: Complete.

Commented [AP20]: Complete.

Commented [AP21]: Complete.

Commented [AP22]: Watershed to produce SED Map

Update

			County-specific provisions, do not inadvertently affect future UGA expansion. Action No specific action at this time
Critical Areas			
4	Floodplain Regulations	CAO Sections 11.50.070, 11.50.140 & SMC Chapter 11.19 'Flood Damage Prevention'	Review: The floodplain and FEMA language may need to be reviewed, including updates to the cross-referenced County Flood Insurance Study (2009) and flood insurance rate maps (FIRM) as all shorelines on rivers. Action Recommended: Revise regulations as needed.
¹ This column attempts to capture the primary relevant location(s) of content related to the item described in the Summary of Change column; however, due to length of the SMP and SMC, all relevant locations may not be listed.			

Commented [AP23]: Removed regional Flood Hazard provisions from the SMP (16D.05). The City will rely on the regulations listed here to address flood hazard management in shoreline jurisdiction.

Commented [AP24]: City to complete revisions to flood management regulations.

6. References

Ecology (Washington State Department of Ecology). November 2019. Shoreline Permitting Manual: Guidance for Local Governments. Ecology Publication No. 17-06-029. Accessed February 2020. <https://fortress.wa.gov/ecy/publications/documents/1706029.pdf>

Ecology (Washington State Department of Ecology). September 2019. Revised Periodic Review Checklist Guidance. Shoreline Master Program Periodic Review. Accessed February 2020. https://fortress.wa.gov/ecy/ezshare/sea/ShorelinePlannerToolbox/2019/PeriodicReviewChecklist_Guidance_9-19_rev.pdf

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