

**Attachment B: The following changes are required to comply with the SMA (RCW 90.58) and the SMP guidelines (WAC 173-26, Part III).**

ITEM	SMP PROVISION	TOPIC	Bill Format Changes [ <u>underline</u> -additions; <del>strikethrough</del> -deletions]	ECOLOGY - DISCUSSION/RATIONALE
1.	20.30.025 Critical Areas 2. a. iv. (Regulations)	20.30.025 Critical Areas Isolated Category III & IV Wetlands.	<u>vi. BMC 19.40.300.-3.C(Category III &amp; IV Wetland Exemption) does not apply and is not considered part of the SMP.</u>	<p>WAC 173-26-221 (2) (i) (B) requires local governments to use the applicable Washington state rating system. The current rating system (<a href="#">Washington State Wetland Rating System for Western Washington, Department of Ecology publication number 14-06-029.</a>) includes Small hydrologically isolated wetlands.</p> <p>This change also increases consistency with WAC 173-26-201(2) (c) (protection of ecological functions of the shoreline). Therefore, the identified change is necessary to assure consistency with SMP-Guidelines requirements at WAC 173-26-186 (8) (b) and WAC 173-26-221 related to designing SMP provisions to achieve no net loss of shoreline ecological functions and consistency with wetland development standards.</p> <p>Excluding the small wetland CAO exemption in shoreline jurisdiction will also be more consistent with state and federal permitting standards, as these wetlands are all regulated by Ecology.</p>
2.	20.30.025 Critical Areas 2. Regulations	20.30.025 Critical Areas 2. Regulations Streams – Development Standards	20.35.025.a.iv ( <i>new subsection</i> ) BMC 19.40.350.2.F.ii. <u>is amended as follows:</u> Standard buffer width averaging may be allowed by the Director (in accordance with an approved critical area review) if: ii. Minimum buffer width is the greater of <del>forty</del> <u>seventy-five percent (75%)</u> of the standard buffer width or twenty-five (25) feet;	<p>Outright buffer reduction will not protect critical area functions and we recommend that reductions in the standard buffer width be limited to no more than 25% and only when used with buffer averaging. Critical areas best available science shows that significant buffer degradation occurs when buffer reduction exceeds 25%.</p> <p>Limited buffer reductions to 25% also increases consistency with the general provisions for achieving no net loss of shoreline ecological functions (WAC 173-26-</p>

ITEM	SMP PROVISION	TOPIC	Bill Format Changes [ <u>underline</u> -additions; <del>strikethrough</del> -deletions]	ECOLOGY - DISCUSSION/RATIONALE
				186 (8) (b), and WAC 173-26-201(2) (c) (protection of ecological functions of the shoreline).