

# Final Draft Gap Analysis Report

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## Shoreline Master Program City of Issaquah

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Prepared on behalf of:



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## 1. Introduction

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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 or rules, changes to local plans and regulations, changes in local circumstances, and new or improved data and information.

The City of Issaquah (City) adopted its current SMP in February of 2013 (Ordinance No. 2669). Shorelines of the State in Issaquah are Lake Sammamish, the Mainstem of Issaquah Creek, and the East Fork Issaquah Creek. Issaquah's SMP includes goals and policies, shoreline environment designations, and development regulations that guide the development and protection of these shorelines.

As a first step in the periodic review process, The Watershed Company (Watershed) reviewed the current SMP for consistency with legislative amendments made since its adoption. Watershed staff also reviewed the current SMP for consistency with the policies in Issaquah's 2018 Parks Strategic Plan and Central Issaquah Plan, in addition to aligning to development regulations in the Issaquah Municipal Code (IMC). Finally, as the periodic review process represents an opportunity to revise and improve the SMP, both City and Watershed staff reviewed the current SMP for overall usability.

The purpose of this gap analysis report is to provide a summary of the review and 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 consistency with legislative amendments. This analysis is based on a list of amendments between 2007 and 2017, 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 with the City's Critical Areas Regulations (CAR) (IMC Chapter 18.10). The CAR was most recently updated in 2013, and applies to critical areas outside of shoreline jurisdiction, while SMP Appendix A contains its own separate set of regulations that apply to critical areas within shoreline jurisdiction.
- **Section 4** identifies gaps in consistency with the City's Parks Strategic Plan, Comprehensive Plan, Central Issaquah Plan, and IMC Title 18, Land Use Code other than the CAO.

For each section, the report presents the topic, relevant section(s) in the SMP, a summary of the analysis (consistency or usability), and a recommendation for revisions to the SMP.

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, but 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 or for improved clarity and consistency, but that are not required or recommended for consistency with state laws.
- **“No change needed”** indicates no change to the SMP is required.

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.

<b>Abbreviation</b>	<b>Meaning</b>
BAS	Best Available Science
CARs	Critical Areas Regulations
City	City of Issaquah
Ecology	Washington State Department of Ecology
FEMA	Federal Emergency Management Agency
IMC	Issaquah Municipal Code
PHS	Priority Habitat Species
RCW	Revised Code of Washington
SSDP	Shoreline Substantial Development Permit
SMA	Washington State Shoreline Management Act
SMP	City Shoreline Master Program
WAC	Washington Administrative Code
WDFW	Washington State Department of Fish and Wildlife

## 2. Consistency with Legislative Amendments

Table 2 summarizes mandatory and recommended revisions to the Issaquah SMP based on the review of consistency with legislative amendments made since SMP adoption. Topics are organized in reverse chronological order of legislative amendments addressed. In general, mandatory changes to the SMP are minor in nature. The majority of them address revised rules with regard to SMP applicability, including updated exemption thresholds and definitions.

Note that section numbers will be updated during the revision process. The section numbers listed in the Table below may differ from those in proposed updates to the SMP.

Table 2. Summary of gaps in consistency with legislative amendments, and associated mandatory and recommended SMP revisions.

<b>Row</b>	<b>Summary of change</b>	<b>Review</b>	<b>Action</b>
<b>2017</b>			
<b>a.</b>	Office of Financial Management (OFM) adjusted the <b>cost threshold for substantial development</b> to \$7,047.	<b>Review:</b> The SMP definition of “substantial development” incorporates a cost threshold amount of \$5,718.  <b>Relevant Section(s):</b> <ul style="list-style-type: none"> <li>SMP Chapter 2 (pg. 21)</li> </ul>	<b>Mandatory:</b> Update the definition of and all other cost threshold amounts related to “substantial development” to reflect the new threshold. In addition, WAC 173-27-040 can be referenced to automatically update the threshold in the future.
<b>b.</b>	Ecology amended rules to clarify that the <b>definition of “development”</b> does not include dismantling or removing structures.	<b>Review:</b> The SMP definition of “development” does not include clarifying language explicitly excluding “dismantling or removing structures” as development.  <b>Relevant Section(s):</b> <ul style="list-style-type: none"> <li>SMP Chapter 2, Definitions (pg. 13)</li> </ul>	<b>Mandatory:</b> Update the definition of “development” to include explicit language excluding “dismantling or removing structures” as development.
<b>c.</b>	Ecology adopted rules that clarify <b>exceptions to local review under the SMA.</b>	<b>Review:</b> The SMP does not include these exceptions to local review under the SMA.  <b>Relevant Section(s):</b> SMP Chapter 8.2, Shoreline Permits	<b>Mandatory:</b> Create a separate subsection in the SMP to reference exceptions to local review in WAC 173-27-044 & -045, as amended. This could be added under SMP Chapter 8.2.
<b>d.</b>	Ecology amended rules that clarify <b>permit filing procedures</b> consistent with a 2011 statute.	<b>Review:</b> The SMP already incorporates the correct wording “date of filing” into	<b>No change needed.</b>

Row	Summary of change	Review	Action
		<p>language referring to the start of the appeal period.</p> <p><b>Relevant Section(s):</b> SMP Chapter 8.4, Final approval of shoreline permits</p>	
e.	<p>Ecology amended <b>forestry use regulations</b> to clarify that forest practices that only involves timber cutting are not SMA “developments” and do not require SDPs.</p>	<p><b>Review:</b> The SMP does not omit timber cutting from being a development and requiring a SDP. Under Table 1, within SMP 4.5, it is not a listed use. Therefore, it would be subject to a Shoreline Conditional Use Permit.</p> <p><b>Relevant Section(s):</b> SMP 4.5 Use and Standards Tables, specifically Table 1, Permitted Shoreline Uses, and 8.2.3, Exemptions from a Substantial Development Permit</p>	<p><b>Recommended:</b> Update the language in Table 1 and Chapter 8.2.3 to exclude the forest practice of timber cutting from requiring a SDP. Sample language is available. LCS: Add this</p>
f.	<p>Ecology clarified the SMA does not apply to lands under <b>exclusive federal jurisdiction</b></p>	<p><b>Review:</b> There are no Federal Lands in City Shoreline Jurisdiction. Therefore, this provision does not apply.</p> <p><b>Relevant Section(s):</b> N/A</p>	<p><b>No change needed.</b></p>
g.	<p>Ecology clarified “default” provisions for <b>nonconforming uses and development.</b></p>	<p><b>Review:</b> The SMP definitions section only has one definition for “nonconforming use,” and the “nonconforming structures” section needs to be updated to incorporate new language for nonconforming structure, use, and lot.</p> <p><b>Relevant Section(s):</b> SMP Chapter 2, Definitions (pg. 17) and 8.6, Nonconforming Uses and Structures</p>	<p><b>Recommended:</b></p> <ol style="list-style-type: none"> <li>1) Update the definition of “nonconforming use” with distinctions for nonconforming use, structure, and lot consistent with WAC 173-27-080. These nonconforming definitions are to be used within shoreline jurisdiction only.</li> <li>2) Update SMP Chapter 8.6 with new language pertaining to nonconforming lots and structures.</li> </ol>

<b>Row</b>	<b>Summary of change</b>	<b>Review</b>	<b>Action</b>
h.	Ecology adopted rule amendments to clarify the scope and process for conducting <b>periodic reviews</b> .	<b>Review:</b> Not currently included in the SMP.  <b>Relevant Section(s):</b> SMP Chapter 1.4, Adoption Authority	<b>No change needed.</b>
i.	Ecology adopted a new rule creating an <b>optional SMP amendment process</b> that allows for a shared local/state public comment period.	<b>Review:</b> Not currently included in the SMP.  <b>Relevant Section(s):</b> N/A	<b>No change needed.</b>
j.	<b>Submittal</b> to Ecology of proposed SMP amendments.	<b>Review:</b> Not currently included in the SMP  <b>Relevant Section(s):</b> N/A	<b>No change needed.</b>
<b>2016</b>			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing structures to comply with the <b>Americans with Disabilities Act</b> .	<b>Review:</b> The SMP does capture this exemption with a reference to WAC 173-27-040.  <b>Relevant Section(s):</b> SMP Chapter 8.2.3, Exemptions from a Shoreline Substantial Development Permit	<b>No change needed.</b>
b.	Ecology updated <b>wetlands critical areas guidance</b> including implementation guidance for the 2014 wetlands rating system.	<b>Review:</b> The SMP references the wetland rating system from 2004 (Ecology Publication #04-06-025).  <b>Relevant Section(s):</b> Appendix A 18.10.620, Wetland rating system	<b>Mandatory:</b> Repeal Appendix A and adopt by IMC 18.10 by Ordinance as it already lists the up-to-date Wetland rating system for Western Washinton (Ecology Publication #14-06-029).
<b>2015</b>			
a.	The Legislature adopted a <b>90-day target</b> for local review of Washington State Department of Transportation (WSDOT) projects.	<b>Review:</b> Currently not included in the SMP.  <b>Relevant Section(s):</b> SMP 5.17.2, Transportation Facilities, Regulations	<b>Recommended:</b> Add a reference to RCW 47.01.485 under SMP 5.17.2 to implement the 90 day local review time for WSDOT projects consistently with the statute.
<b>2014</b>			
a.	The Legislature raised the cost threshold for requiring a Substantial Development Permit (SDP) for <b>replacement docks on</b>	<b>Review:</b> The SMP cites RCW 90.58.030 for exemptions of SDP several times throughout the document. Cost threshold	<b>No change needed.</b>

<b>Row</b>	<b>Summary of change</b>	<b>Review</b>	<b>Action</b>
	<b>lakes and rivers</b> to \$22,500 <sup>1</sup> (from 10,000) and all freshwater docks to \$11,200.	increases are automatically updated through this citation.  <b>Relevant Section(s):</b> SMP Chapters 1.5.5.a, 2.39, 2.98, 8.2.3.2, 8.2.3.4	
<b>b.</b>	The Legislature created a new definition and policy for <b>floating on-water residences</b> legally established before 7/1/2014.	<b>Review:</b> The SMP explicitly prohibits floating homes or live-aboards. No floating homes are within City limits.  <b>Relevant Section(s):</b> SMP Chapter 6.1.2, Lake Sammamish Shoreline Policies and Regulations, Use Regulations	<b>No change needed.</b>
<b>2012</b>			
<b>a.</b>	The Legislature amended the SMA to clarify <b>SMP appeal procedures</b> .	<b>Review:</b> The SMP does not address appeals to the process amending shoreline master programs, per RCW 90.58.190, Appeal of department's decision to adopt or amend a master program. To note, this is an appeal of the City's SMP itself, not a shoreline permit application. This change is not required since the SMP does not touch on appeals to SMPs themselves.  <b>Relevant Section(s):</b> N/A	<b>No change needed.</b>
<b>2011</b>			
<b>a.</b>	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved <b>federal wetland delineation manual</b> .	<b>Review:</b> The SMP properly cites WAC 173-22-035 and the federal delineation manual.  <b>Relevant Section(s):</b> SMP Appendix A 18.10.615(B), Wetland delineations	<b>No change needed.</b>

<sup>1</sup> Based upon OFM Notice of Substantial Development Dollar Threshold Adjustment in accordance with RCW 90.58.030 (3)(e)(vii), effective November 4, 2018.

<b>Row</b>	<b>Summary of change</b>	<b>Review</b>	<b>Action</b>
b.	Ecology adopted rules for new commercial <b>geoduck aquaculture</b> .	<b>Review:</b> Issaquah is not within marine shoreline jurisdiction and therefore does not address this in the SMP.  <b>Relevant Section(s):</b> N/A	<b>No change needed.</b>
c.	The Legislature created a new definition and policy for <b>floating homes</b> permitted or legally established prior to January 1, 2011.	<b>Review:</b> The SMP explicitly prohibits floating homes or live-aboards.  <b>Relevant Section(s):</b> SMP Chapter 6.1.2 Lake Sammamish Shoreline Policies and Regulations, Use Regulations	<b>See 2014-b above.</b>
d.	The Legislature authorized a new <b>option to classify existing structures as conforming</b> .	<b>Review:</b> This is addressed in the SMP within nonconforming structures.  <b>Relevant Section(s):</b> SMP Chapter 8.6.2, Nonconforming structures	<b>No change needed.</b>
<b>2010</b>			
a.	The Legislature adopted <b>Growth Management Act – Shoreline Management Act clarifications</b> .	<b>Review:</b> The SMP does not discuss the amendment process.  <b>Relevant Section(s):</b> N/A	<b>No change needed.</b>
<b>2009</b>			
a.	The Legislature created new “relief” procedures for instances in which a <b>shoreline restoration project within a UGA</b> creates a shift in Ordinary High Water Mark.	<b>Review:</b> The SMP references RCW 90.58.580 and the option of regulatory relief for OHWM changes due to restoration.  <b>Relevant Section(s):</b> SMP Chapter 5.6.2.11, Buffers and Restored Shorelines	<b>No change needed.</b>
b.	Ecology adopted a rule for certifying <b>wetland mitigation banks</b> .	<b>Review:</b> The SMP already incorporates wetland mitigation banking.  <b>Relevant Section(s):</b> SMP Appendix A 18.10.720(I), Wetland Mitigation Banking	<b>No change needed.</b>



Row	Summary of change	Review	Action
c.	The Legislature added <b>moratoria authority</b> and procedures to the SMA.	<p><b>Review:</b> The SMP addresses moratoria authority and references RCW 90.58.</p> <p><b>Relevant Section(s):</b> SMP Chapter 1.9, Authority for Moratoria under Shoreline Management</p>	<b>No change needed.</b>
<b>2007</b>			
a.	The Legislature clarified <b>options for defining "floodway"</b> as either the area that has been established in FEMA maps, or the floodway criteria set in the SMA.	<p><b>Review:</b> The SMP has two different definitions of Floodway: the main SMP using the FEMA maps definition, and appendix B, Areas of Special Flood Hazard, using another.</p> <p><b>Relevant Section(s):</b> SMP Chapter 2.45, Floodway definition, Appendix B 16.36.030(16), "Floodway"</p>	<p><b>Recommended:</b> The floodway definition within the Areas of Special Flood Hazard, IMC Chapter 16.36 and the soon to be adopted Ordinance have been updated to be consistent. The Floodway definition within SMP 2.45 is consistent with Ecology guidance for matching FEMA flood insurance rate maps. Therefore, Appendix B as a whole will be repealed and the SMP will reference the specifically adopted Ordinance for IMC 16.36, Areas of Special Flood Hazard, which incorporates the floodway definition to be consistent with this Ecology-recommended definition.</p>
b.	Ecology amended rules to clarify that comprehensively updated SMPs shall include a <b>list and map of streams and lakes</b> that are in shoreline jurisdiction.	<p><b>Review:</b> The SMP references maps held by the city for critical areas in shoreline jurisdiction.</p> <p><b>Relevant Section(s):</b> SMP Appendix A 18.10.380, Agency resource maps</p>	<b>No change needed.</b>
c.	Ecology's rule listing statutory exemptions from the requirement for an SDP was amended to include <b>fish habitat enhancement projects</b> that conform to the provisions of RCW 77.55.181.	<p><b>Review:</b> SMP Appendix A already includes this provision.</p> <p><b>Relevant Section(s):</b> SMP Appendix A 18.10.775(G)(2), Enhancements Independent of Development Proposals</p>	<b>No change needed.</b>

### 3. Integration of Current Critical Areas Regulations

The City’s current SMP incorporates sections from the City-wide critical areas regulations (CARs) as Appendix A, under Ordinance No. 2455 adopted in 2006. The City last updated their CAR in 2016 by Ordinance No. 2783, codified as Chapter 18.10, Environmental Protection. The results of CAR integration with the SMP are discussed below in Table 3-1. To note, it is our understanding the CARs for environmentally sensitive areas outside shoreline jurisdiction will be updated at a later date.

Table 3-1 Critical Area Regulation inconsistencies with SMP regulation

#	Topic	Review & Relevant Location(s)	Action
1	CAR exclusions from SMP	<p><b>Review:</b>                      The SMP currently excludes provisions of Issaquah Critical Areas Regulations under Appendix A of the SMP that include those “relating to ‘Exemption’, ‘Variance’ and Nonconforming Situations’ code provisions, as listed under SMP 5.6.2, Regulations within Critical Areas, Environmental Protection and Shoreline Buffers.                      This is a necessary step to ensure compliance with the SMA, although the guidance could be further clarified for City staff and residents by explicitly stating which sections shall not apply in shoreline jurisdiction. These specific sections in the CAO clearly state that they are not applicable in shoreline jurisdiction, although those same statements do not exist in the corresponding sections of SMP Appendix A, specifically IMC 18 variance process</p> <p><b>SMP:</b></p> <ul style="list-style-type: none"> <li>• 5.6.2.(2)</li> </ul> <p><b>Appendix A:</b></p> <ul style="list-style-type: none"> <li>• 18.10.400, Exemptions</li> </ul>	<p><b>Recommended:</b> Modify language in SMP to cite the specific sections of SMP of the Issaquah Environmental Protection Chapter IMC 18.10 which do not apply, and include statements of exclusion in the relevant sections.</p>

#	Topic	Review & Relevant Location(s)	Action
		<ul style="list-style-type: none"> <li>18.10.430, Variances</li> </ul> 18.08, Nonconforming Situations	
2	Adopt by Ordinance CAR and Areas of Special Flood Hazards ordinances	<p><b>Review:</b>            The most recent CAR under Ordinance 2669 is more up-to-date with best available science (BAS), resulting in a greater environmental protection of shorelines of the state within the City. In addition, the floodway definition under Ecology guidance is being placed directly into IMC 16.36, Areas of Special Flood Hazard, instead of Appendix B of the same title. IMC 16.36 is also more up-to-date than that found in Appendix B.</p> <p><b>Zoning:</b>            IMC 18.10, Environmental Protection;            IMC 16.36, Areas of Special Flood Hazard</p> <p><b>SMP:</b>            Appendix A            Ordinance 2669, IMC 18.10            Appendix B</p>	<p><b>Recommended:</b> Adopt by ordinance the most recent CAR and Areas of Special Flood Hazard followed by repealing Appendix A and B and then go through and add the exclusions stated above. Adoption by reference will require the City to open and amend their SMP upon future amendments to their CAR, IMC 18.10 Environmental Protection.</p>
3	Wetland buffer table change.	<p><b>Current critical areas regulations:</b></p> <ul style="list-style-type: none"> <li>IMC Table 18.10.640.C, Wetland Buffer Standards</li> </ul>	<p><b>Review:</b>            Department of Ecology provided revised wetland buffer guidance in July of 2018. The revised guidance indicates that wetlands scoring of 5 habitat points may use the same standard buffer width as wetlands scoring 3-4 habitat points.</p> <p><b>Action:</b>  <b>Recommended:</b> Consider revising the existing wetland buffer provisions in IMC 18.10.640, Wetland buffer width requirements, of the critical areas regulations for consistency with Ecology guidance, related to habitat scores and wetland</p>

#	Topic	Review & Relevant Location(s)	Action
			buffers. A discussion is provided below.

## Wetlands

In July 2018, Ecology updated its guidance for wetland buffers<sup>2</sup>. 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 existing wetland buffers, as shown in Table 3.2, are based on wetland rating, habitat score. This approach is similar to Ecology’s 2018 guidance. However, the buffer widths included are not wholly consistent with best available science which has to do in part with re-grouping habitat scores for lower functioning wetlands, resulting in an overall buffer reduction for these wetlands. Other measures described below have to do with incorporating a list of wetland minimization measures in addition to establishing a vegetated corridor connecting a wetland buffer to an on-site priority habitat species (PHS) area as defined by Washington Department of Fish and Wildlife (WDFW). To align the SMP provisions with the updated guidance, we recommend updating the buffer provisions for consistency with Ecology’s new guidance for wetland buffer widths, as shown in Table 3.3 below.

Wetland buffer provisions in the City’s 2016 CAR vary substantially from the provisions in the City’s current SMP Appendix A, CAR. This variation may result in confusion about how wetland buffers are applied throughout the City, and results in wetland buffers being administered inconsistently in Issaquah depending on project location. Therefore, the proposed update for wetland buffers will occur within the City-wide CAR and the SMP will adopt this change by ordinance, removing Appendix A for separate critical areas regulations within shoreline jurisdiction.

In order to utilize these updated wetland buffers, applicants are required to implement wetland minimization measures (see table 3.4), in addition to a relatively undisturbed, protected vegetated corridor at least 100-foot wide between the wetland and any other PHS areas as defined by WDFW, where applicable, to minimize the impacts of the adjacent land uses. The corridor must be protected for the entire distance between the wetland and the Priority Habitat by some type of legal protection such as a conservation easement. The City currently

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<sup>2</sup>Washington Department of Ecology. July 2018 Modifications for Habitat Score Ranges. Modified from Wetland Guidance for CAO Updates: Western Washington Version. Ecology Publication No. 16-06-001. Accessed November 2018. <https://fortress.wa.gov/ecy/publications/parts/1606001part1.pdf>

Table 3.2 Existing Wetland Buffer Standards table under the IMC 18.10.640.C

Category	Wetland Characteristic	Buffer
<b>I</b> (Wetlands with a total score of 23 to 27 points or more on the DOE Wetland Rating form)	Natural heritage wetlands	190 feet
	Bogs	190 feet
	Forested	Based on score for habitat or water quality functions
	Habitat score of 8 to 9	225 feet
	Habitat score of 7	150 feet
	Habitat score of 5 to 6	100 feet
	Habitat score of 3 to 4	75 feet
<b>II</b> (Wetlands with a total score of 20 to 22 points on the DOE Wetland Rating form)	Habitat score of 8 to 9	225 feet
	Habitat score of 7	150 feet
	Habitat score of 5 to 6	100 feet
	Habitat score of 3 to 4	75 feet
<b>III</b> (Wetlands with a total score of 16 to 19 points on the DOE Wetland Rating form)	Habitat score of 7	110 feet
	Habitat score of 5 to 6	75 feet
	Habitat score of 3 to 5	50 feet
<b>IV</b> <b>over 2,500 square feet</b> (Wetlands with a total score of 9 to 15 points on the DOE Wetland Rating form)	Total score for functions of 9 to 15 points	40 feet
<b>IV</b> <b>less than 2,500 square feet</b>		No buffer required

Table 3.3 Proposed Wetland Buffer Standards table under the IMC 18.10.640.C

Category	Wetland Characteristic	Buffer
<b>I</b> (Wetlands with a total score of 23 to 27 points or more on the DOE Wetland Rating form)	Natural heritage wetlands	190 feet
	Bogs	190 feet
	Forested	Based on score for habitat or water quality functions
	Habitat score of 8 to 9	225 feet
	Habitat score of 6-7	110 feet
	Habitat score of 3 to 5	75 feet
<b>II</b> (Wetlands with a total score of 20 to 22 points on the DOE Wetland Rating form)	Habitat score of 8 to 9	225 feet
	Habitat score of 6-7	110 feet
	Habitat score of 3 to 5	75 feet
<b>III</b> (Wetlands with a total score of 16 to 19 points on the DOE Wetland Rating form)	Habitat score of 8-9	225 feet
	Habitat score of 6 to 7	110 feet
	Habitat score of 3 to 5	60 feet
<b>IV</b> <b>over 2,500 square feet</b> (Wetlands with a total score of 9 to 15 points on the DOE Wetland Rating form)	Total score for functions of 9 to 15 points	40 feet
<b>IV</b> <b>less than 2,500 square feet</b>		No buffer required

Table 3.4 Proposed Wetland Minimization Standards

<b>Disturbance</b>	<b>Required Measures to Minimize Impacts</b>
Lights	<ul style="list-style-type: none"> <li>• Direct lights away from wetland. Lighting levels shall meet the outdoor lighting standards for spillover into critical areas, per IMC 18.07.107.</li> </ul>
Noise	<ul style="list-style-type: none"> <li>• Locate activity that generates noise away from wetland</li> <li>• If warranted, enhance existing buffer with native vegetation plantings adjacent to noise source</li> <li>• 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 or noise impacts shall be minimized through design or insulation techniques.</li> </ul>
Toxic runoff	<ul style="list-style-type: none"> <li>• Route all new, untreated runoff away from wetland while ensuring wetland is not dewatered</li> <li>• Establish covenants limiting use of pesticides within 150 ft of wetland and follow Best Management Practices (BMPs)</li> <li>• Apply integrated pest management</li> </ul>
Stormwater runoff	<ul style="list-style-type: none"> <li>• Retrofit stormwater detention and treatment for roads and existing adjacent development</li> <li>• Prevent channelized flow from lawns that directly enters the buffer</li> <li>• Use Low Intensity Development techniques (per PSAT publication on LID techniques)</li> </ul>
Change in water regime	<ul style="list-style-type: none"> <li>• Infiltrate or treat, detain, and disperse into buffer new runoff from impervious surfaces and new lawns</li> </ul>
Pets and human disturbance	<ul style="list-style-type: none"> <li>• Use privacy fencing OR plant dense vegetation to delineate buffer edge and to discourage disturbance using vegetation appropriate for the ecoregion</li> <li>• Place wetland and its buffer in a separate tract or protect with a conservation easement</li> </ul>
Dust	<ul style="list-style-type: none"> <li>• Use best management practices to control dust</li> </ul>
Disruption of corridors or connections	<ul style="list-style-type: none"> <li>• Maintain connections to offsite areas that are undisturbed</li> <li>• Restore corridors or connections to offsite habitats by replanting</li> </ul>

## 4. Consistency with Comprehensive Plan & Other Development Regulations

The City’s current SMP contains sections which do not necessarily reflect changes to the Issaquah Municipal Code, 2018 Central Issaquah Plan, Issaquah 2018 Parks Strategic Plan, 2018 Olde Town Plan, and 2017 Comprehensive Plan. Table 4-1 below identifies several issues to be considered for amendment.

Table 4-1. Summary of recommended SMP revisions to improve consistency with Master Plan documents.

#	Topic	Review & Relevant Location(s)	Action
1	Trails not called out in Shoreline use table	<p><b>Review</b></p> <p>Trails are missing in SMP Table 1 as a permitted use, resulting in confusion with how this use may be applied.</p> <p><b>SMP:</b> 4.5 – Table 1, Permitted Shoreline Uses Page 37</p>	<p><b>Action</b></p> <p>Either amend recreational uses in SMP Table 1 to include trails or list within this table as a separate use.</p>
2	Dimensional Standards conflicts between Shoreline Environments and Zoning	<p><b>Review</b></p> <p>Specific zoning based setback and impervious surface limits conflict with recent changes in zoning.</p> <p><b>SMP</b> 4.5 – Table 2, Development Standards for Shoreline Environments Page 37</p>	<p><b>Action</b></p> <p>Code can instead reflect the current zoning designations replace obsolete zoning references in the future through eliminating them in SMP Table 2. Use of ‘Consistent with underlying zoning’ will be listed for side setbacks and max density listings for each shoreline jurisdiction as an alternative.</p> <p>LCS: Agree</p>
3	Trail width	<p><b>Review</b></p> <p>While trails are allowed within shoreline buffers, specifically a four-foot maximum width, SMP 6.1.3 does not differentiate between public and private trails. Within the waterward 50% of the buffer, this does not account for other usability factors for public shoreline trails where site constraints may involve a shoreline variance to allow for wider public trails for safety and usability purposes.</p> <p><b>SMP:</b></p>	<p><b>Action</b></p> <p>Consider changing the minimum 4’ width requirement to “the minimum necessary based upon safety and anticipated use volumes.” LCS: Agree</p> <p>In addition, trail maintenance activities, including clearing and grubbing limits, should be considered and codified to keep vegetation from impacting trails over time. LCS: Agree</p>



#	Topic	Review & Relevant Location(s)	Action
		6.1.3, Shoreline Buffers and Setbacks – Allowed Uses Within Shoreline Buffers	
4	SMP Map consistency with current City Limits	<p><b>Review</b></p> <p>Map Figures 1 and 2 need to show recently annexed areas such as Sammamish State Park within City limits.</p> <p><b>SMP:</b> 4.5, Shoreline Environment Designations Map</p>	<p><b>Action</b></p> <p>Update map Figures 1 and 2 to show latest City limits boundaries.</p>