

City of Lake Forest Park Shoreline Master Program

Draft Gap Analysis Report

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1. Introduction

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 Lake Forest Park (City) adopted its current SMP in 2013 (Ordinance No. 1042). Shorelines of the State in Lake Forest Park are limited to Lake Washington. The Lake Forest Park 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 Lake Forest Park's Comprehensive Plan, adopted in January 2016 (Ordinance No. 1114), and with the implementing development regulations Lake Forest Park Municipal Code (LFPMC). 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 Ordinance (CAO) (LFPMC Chapter 16.16). The CAO was most recently updated in March 2017, and applies to critical areas outside of shoreline jurisdiction, while the SMP 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 Comprehensive Plan, and with implementing sections of the City's development regulations other than the CAO.
- **Section 5** identifies issues of usability noted by both City staff and the Watershed team.

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.

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
City	City of Lake Forest Park
Ecology	Washington State Department of Ecology
FEMA	Federal Emergency Management Agency
RCW	Revised Code of Washington
SMP	Shoreline Master Program
WAC	Washington Administrative Code
LFPMC	Lake Forest Park Municipal Code

2. Consistency with Legislative Amendments

Table 2 summarizes mandatory and recommended revisions to the Lake Forest Park 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.

Row	Summary of change	Review	Action
2017			
a.	OFM adjusted the cost threshold for substantial development to \$7,047.	The SMP definition for “substantial development” includes an outdated cost threshold of \$5,000. SMP Chapter 8.4 references WAC 173-27-040 with an amount of \$5,718 as the as the cost threshold for “substantial development.” Relevant Section(s): SMP Chapter 2 (page 26), SMP Chapter 3.3.(C)6(a) (page 31), & SMP Chapter 8.4 (page 128).	Mandatory: The City plans to update the definition of “substantial development” and all other cost threshold amounts related to “substantial development” to reflect the new threshold. In addition, WAC 173-27-040 will be referenced to automatically update this threshold in the future.
b.	Ecology amended rules to clarify that the definition of “development” does not include dismantling or removing structures.	SMP definitions do not include language to clarify that dismantling or removing structures is not considered development. DOE suggested language: “ <i>Development</i> ” does not include dismantling or removing structures if there	Mandatory: The City plans to add Ecology’s suggested language to the end of the definition of “development” in Ch. 2.

Row	Summary of change	Review	Action
		<p><i>is no other associated development or re-development.</i></p> <p>Relevant Section(s): SMP Chapter 2 (page 15)</p>	
c.	Ecology adopted rules that clarify exceptions to local review under the SMA.	<p>The SMP does not include these exceptions to local review under the SMA.</p>	<p>Mandatory: The City plans to add the reference to statutory exceptions and create a separate section in the SMP to reference exceptions to local review in WAC 173-27-044, and -045, as amended.</p> <p>Section 3.4, was modified to ensure exemptions for Substantial Development Permits are not confused with these exemptions to the local review process.</p>
d.	Ecology amended rules that clarify permit filing procedures consistent with a 2011 statute.	<p>The SMP does not reference RCW 90.58.140(6) in relation to determining the start of the appeal period and has the old wording of “date of receipt” to determine the start date. Furthermore, there is no reference to WAC 173-27-130 in regards to filing procedures.</p> <p>Relevant Section(s): SMP Chapters 3.5 (page 44)</p>	<p>Recommended: The City plans to re-write Section 3.5(J) using Ecology’s example language to replace “date of receipt” with “date of filing” and RCW 90.58.180 with RCW 90.58.140(6) and include proper filing procedures.</p> <p>Section 3.5(J) rewritten using Ecology’s example language.</p>
e.	Ecology amended forestry use regulations to clarify that forest practices that only involves timber cutting are not	Forest practices are a prohibited use activity within shoreline jurisdiction.	No change needed.

Row	Summary of change	Review	Action
	SMA “developments” and do not require SDPs.	Relevant Section(s): SMP Chapters 7.6 (page 90)	
f.	Ecology clarified the SMA does not apply to lands under exclusive federal jurisdiction	There are no lands under exclusive federal jurisdiction on the shoreline of Lake Washington overlapping with Lake Forest Park’s jurisdiction.	No change needed.
g.	Ecology clarified “default” provisions for nonconforming uses and development .	<p>Definition of “nonconforming use and development” are combined with “nonconforming lot,” separate definitions are not included..</p> <p>The SMP establishes its own provisions for nonconforming use and development standards.</p> <p>Relevant Section(s): SMP Chapters 2 and 3.9 (page 47)</p>	<p>Recommended: The City plans to update definitions for nonconforming use, nonconforming lot, and nonconforming development/structure to maintain consistency with WAC 173-27-080. Section 3.10 is planned to be reworded to reflect the updated language in the definitions.</p> <p>Under SMP Section 3.10, Nonconforming Use and Development Standards, the existing nonconforming provisions appear to capture the intent of the Ecology recommended language. Therefore, no change is necessary to Section 3.9 of the SMP.</p> <p>Definitions were added in chapter 2 outlining the 3 nonconforming definitions. Section 3.10 was reworded to reflect the new definitions.</p>
h.	Ecology adopted rule amendments to clarify the	The Master Program Review section references WAC 173-26, thereby	No change needed.

Row	Summary of change	Review	Action
	scope and process for conducting periodic reviews .	including WAC 173-26-090 as a description of the SMP periodic review process. Relevant Section(s): SMP Chapter 3.11 (page 50)	
i.	Ecology adopted a new rule creating an optional SMP amendment process that allows for a shared local/state public comment period.	The SMP references WAC 173-26 and RCW 90.58.120 and .200 to establish procedures for SMP amendments. Relevant Section(s): SMP Chapter 3.12 (page 50)	<i>No change needed.</i>
j.	Submittal to Ecology of proposed SMP amendments.	The SMP references WAC 173-26 and RCW 90.58.120 and .200 to establish procedures for SMP amendments. Relevant Section(s): SMP Chapter 3.12 (page 50)	<i>No change needed.</i>

2016

a.	The Legislature created a new shoreline permit exemption for retrofitting existing structures to comply with the Americans with Disabilities Act .	The SMP lays out the exemption policies rather than citing the RCW list of exemptions, thus this new exemption must be added. Relevant Section(s): SMP Chapter 3.3(C)	Mandatory: The City plans to add the ADA exemption using Ecology example language. Exemption add as 3.3(m).
b.	Ecology updated wetlands critical areas guidance including implementation guidance for the 2014 wetlands rating system.	Although the SMP's Appendix A cites the wrong wetland rating system, the new structure of the SMP will adopt by reference the current CAO ordinance, which uses the most up to date rating system. Therefore, no change is	<i>No change needed.</i>

Row	Summary of change	Review	Action
		<p>needed to capture this update.</p> <p>Relevant Section(s): SMP Appendix A</p>	
2015			
a.	The Legislature adopted a 90-day target for local review of Washington State Department of Transportation (WSDOT) projects.	<p>The SMP does not address the review process for WSDOT projects.</p> <p>Relevant Section(s): SMP Chapter 7.13 (page 104)</p>	<p>Recommended: The City plans to amend Ch. 7.13 to redefine review timelines for WSDOT projects per WAC 173-27-125.</p> <p>Regulations added in section 7.13 as D & E.</p>
2014			
a.	The Legislature raised the cost threshold for requiring a Substantial Development Permit (SDP) for replacement docks on lakes and rivers to \$22,500 ¹ (from \$10,000).	<p>The SMP references the outdated threshold of \$10,000 for replacement residential docks.</p> <p>Relevant Section(s): SMP Chapter 3.3.C.6.(f) (page 33)</p>	<p>Mandatory: The City plans to update Ch. 3.3.C.6(f) to reference WAC 173-27-040. The WAC reference brings the current cost threshold into compliance and will allow the cost threshold to update automatically along with updates to SMA rules.</p> <p>Section 3.3.C.6(f) updated to include appropriate wording and references.</p>
b.	The Legislature created a new definition and policy for floating on-water residences legally established before 7/1/2014.	Lake Forest Park has no existing floating on-water residences.	No change needed.

¹ Based upon Office of Financial Management Notice of Substantial Dollar Threshold Adjustment in accordance with RCW 90.58.030 (3)(e)(vii), effective November 4, 2018.

Row	Summary of change	Review	Action
2012			
a.	The Legislature amended the SMA to clarify SMP appeal procedures .	The SMP does not address SMP appeal process.	No change needed.
2011			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved federal wetland delineation manual .	References to the Washington State Wetland Identification and Delineation Manual, which has been repealed. Relevant Section(s): SMP Appendix A 40 - definitions section.	Recommended: The City plans on changing Appendix A, Environmentally Sensitive Areas Regulations in Shoreline Jurisdiction to reference Ch. 16.16 in LFPMC to maintain as much consistency as possible with current CAO and shoreline CAO regulations. See Section 3, comment 1 below for more details.
b.	Ecology adopted rules for new commercial geoduck aquaculture .	Not applicable. Lake Forest Park has no saltwater shorelines.	Not applicable.
c.	The Legislature created a new definition and policy for floating homes permitted or legally established prior to January 1, 2011.	Lake Forest Park has no existing floating on-water residences.	No change needed.
d.	The Legislature authorized a new option to classify existing structures as conforming .	The SMP incorporates this legislation in Ch. 3.9.	No change needed.
2010			
a.	The Legislature adopted Growth Management Act – Shoreline Management Act clarifications .	No mention of “effective date” of SMP amendments. Relevant Section(s): SMP Chapter 3.12	Recommended: The City plans to specify the “effective date” of SMP amendments as 14 days

Row	Summary of change	Review	Action
			from Ecology's written notice of final action. Wording include in section 3.12.
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.	This is already incorporated in the SMP but without WAC reference. Relevant Section(s): SMP Chapter 8.3.12	Recommended: The City plans to reference WAC 173-27-215 at the end of Chapter 8.3.12b for further clarification.
b.	Ecology adopted a rule for certifying wetland mitigation banks .	SMP includes language similar to the example language by Ecology that allows the use of mitigation credits from an approved mitigation bank. Relevant Section(s): SMP Appendix A 340(G)2 and LFPMC 16.16.340(E)4b	No change needed.
c.	The Legislature added moratoria authority and procedures to the SMA.	The SMP does not address moratoria authority.	No change 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 SMP includes option 2 of the Ecology example language in the definition of "Floodway" Relevant Section(s): SMP Chapter 2	No change needed.
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.	The necessary maps are included as an appendix to the SMP. Relevant Section(s): SMP Appendix C	No change needed.

Row	Summary of change	Review	Action
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.	The SMP already incorporates language similar to Ecology's example and references WAC 173-27-040. Relevant Section(s): SMP Chapter 3.3(C)6k	No change needed.

3. Integration of Current Critical Areas Regulations

The City's current SMP incorporates sections from the City-wide critical areas regulations (CARs) of Ordinance No. 930. Since adoption of the SMP, the CARs have been amended by Ordinance No. 1150 in 2017. These critical areas regulations are codified in the Lake Forest Park Municipal Code Chapter 16.16 Environmentally Critical Areas. Thus, the City's current SMP includes sections and language of critical areas regulations that are out of date and no longer consistent with critical areas regulations currently applicable in non-shoreline areas of the City.

Through this periodic SMP update the City anticipates integrating the 2017 CARs. However, as with the Ordinance No. 930 (2005), the updated critical area regulations include some regulations inconsistent with the Shoreline Management Act. The inconsistent regulations need to be identified and resolved as part of the periodic SMP update process.

Table 3 below summarizes issues to be resolved in order to properly regulate the City's critical areas consistently into the future.

Table 3-1. Summary of gaps in consistency with current critical areas regulations and associated recommended SMP revisions.

#	Topic	Review and Relevant Location(s)	Action
Applicability			
1	Linkage between CAO and SMP	Review: The SMP regulates critical areas in shoreline jurisdiction through Appendix A, which is a modified version of an older version of the City's CAO than is now in effect. The result is several inconsistencies between the way critical areas are regulated inside and outside of shoreline jurisdiction, and a difficult collection of regulations for a user to navigate. Items 2-13 within this table identify specific inconsistencies.	Action <i>Recommended:</i> The City plans to adopt by reference the current CAO in order to bring the SMP's critical areas regulations into alignment with the more recent regulations. Appendix A of the SMP will clarify the sections of the CAO that do not apply in shoreline jurisdiction, and will provide the necessary alternative or supplemental regulations.

#	Topic	Review and Relevant Location(s)	Action
		<p>Location: SMP Appendix A, LFPMC 16.16, Environmentally Sensitive Areas Regulations in Shoreline Jurisdiction.</p>	The updated Ecology guidance on wetland buffer widths is incorporated in Appendix A (see Gap Analysis item #9 of this section) as Table A-1, with the appropriate updated language above. All other development requirements were taken from 16.16.320 and inserted below in Table.
2	Definitions	<p>Review: The definitions for the following terms are inconsistent in the SMP and LFPMC:</p> <ul style="list-style-type: none"> • Mitigation • Priority habitats • Priority species • Qualified professions • Sensitive areas • Streams • Wetlands • Wetland Boundary • Wetland Functions <p>The following definitions may not be consistent between SMP Ch. 2 and Appendix A.</p> <ul style="list-style-type: none"> • Enhancement • Mitigation • Priority habitat • Priority species • Restoration • Setback • Wetlands <p>Location: SMP Appendix A Sec. 40; LFPMC 16.16.040</p>	<p>Action</p> <p>Recommended: The City plans to take applicable definitions from the more up-to-date critical areas regulation in LFPMC 16.16 and implement them in SMP Appendix A, Environmentally Critical Areas Regulations in Shoreline Jurisdiction.</p>
3	Timing	<p>Review: LFPMC 16.16 has more specific information on expiration of permits and extensions. SMP Appendix A does not include these.</p>	<p>Action</p> <p>Recommended: The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by</p>

#	Topic	Review and Relevant Location(s)	Action
		<u>Location:</u> SMP Appendix A Sec. 140; LFPMC 16.16.140	reference eliminating this inconsistency.
4	Sensitive areas – Markers and signs	<u>Review:</u> LFPMC 16.16 has more requirements for marking and placing signage around sensitive areas. SMP Appendix A is less specific. <u>Location:</u> SMP Appendix A Sec. 170; LFPMC 16.16.170	<u>Action</u> <u>Recommended:</u> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.
5	Notice of title	<u>Review:</u> SMP Appendix A lacks much of the language of the LFPMC 16.16. <u>Location:</u> SMP Appendix A Sec. 190; LFPMC 16.16.190	<u>Action</u> <u>Recommended:</u> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.
6	Sensitive areas rules	<u>Review:</u> This section was repealed by the CAO update Ordinance No. 1150. <u>Location:</u> SMP Appendix A Sec. 210; LFPMC 16.16.210	<u>Action</u> <u>Recommended:</u> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.
7	Development Standards	<u>Review:</u> This section was repealed by the CAO update Ordinance No. 1150. <u>Location:</u> SMP Appendix A Sec. 210; LFPMC 16.16.270	<u>Action</u> <u>Recommended:</u> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.
8	Erosion hazard areas – Development standards – Permitted alterations	<u>Review:</u> LFPMC 16.16 cites Chapter 16.14, tree canopy preservation and enhancement, for tree clearing clarification, while SMP Appendix A does not. <u>Location:</u> SMP Appendix A Sec. 280; LFPMC 16.16.280(E)	<u>Action</u> <u>Recommended:</u> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.
Wetlands			
#	Topic	Review and Relevant Location(s)	Action

#	Topic	Review and Relevant Location(s)	Action
9	Wetland buffer table change	<p>Review: Ecology provided revised wetland buffer guidance in July of 2018. The revised guidance indicates that wetlands scoring 5 habitat points may use the same standard buffer width as wetlands scoring 3-4 habitat points.</p> <p>Location: SMP Appendix A Sec. 320; LFPMC 16.16.320</p>	<p>Action <i>Recommended:</i> The City intends to adopt the most recent critical areas regulations (LFPMC 16.16) and will use Ecology's revised guidance to update its shoreline wetland buffer dimensions.</p> <p>At a later date, the City will consider future revisions to LFPMC 16.16.320 for consistency with Ecology guidance, related to habitat scores and wetland buffers.</p>
10	Wetlands – Permitted alterations	<p>Review: SMP Appendix A is not consistent with LFPMC 16.16.</p> <p>Location: SMP Appendix A Sec. 330; LFPMC 16.16.330</p>	<p>Action <i>Required:</i> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.</p>
11	Wetlands – Mitigation requirements	<p>Review: SMP Appendix A references out dated requirements and regulations. LFPMC 16.16 incorporates updated wetland mitigation ratios and reference(s).</p> <p>Location: SMP Appendix A Sec. 340; LFPMC 16.16.340</p>	<p>Action <i>Required:</i> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.</p>
Streams			
#	Topic	Review and Relevant Location(s)	Action
12	Streams – Development standards	<p>Review: SMP Appendix A stream typing is outdated. LFPMC 16.16 cites WAC 222-16-030 for up-to-date classification and created a new subsection for development standards for each classification type.</p> <p>Location: SMP Appendix A Sec. 350; LFPMC 16.16.350</p>	<p>Action <i>Required:</i> The City plans to adopt the most recent critical areas regulations (LFPMC 16.16) by reference eliminating this inconsistency.</p>
13	Streams – Permitted alterations	Review:	<p>Action <i>Recommended:</i> The City plans to adopt the most recent critical areas</p>

#	Topic	Review and Relevant Location(s)	Action
		<p>SMP Appendix A has a few differing alteration exceptions from the LFPMC 16.16, including G-2 and H.</p> <p><u>Location:</u> SMP Appendix A Sec. 360; LFPMC 16.16.360</p>	regulations (LFPMC 16.16) by reference eliminating this inconsistency.

Continuing discussion on item #9 in Table 3-1 above, newly recommended wetland buffer widths (July 2018) are based upon review of wetland category and habitat score, reflecting best available science by Department of Ecology. In a survey of reference wetlands, Ecology determined more were similarly distributed to scoring between 3-5 points for habitat score than 3-4 points as the original low habitat break point (Ecology 2018). Therefore, the breaks and revised wetland buffer table are as follows under Table 3-2 below.

Wetland buffer impact minimization measures already outlined under Table 3-2 in this Gap Analysis and 16.16.320-2 in LFPMC 16.16.320(A), Wetlands – Development standards, can also be used in allowing buffer averaging for development. The following minimization measures listed under this table may allow buffer averaging to no less than 75% of the original buffer requirement (Ecology 2016). A request for buffer averaging requires a wetland report by a qualified professional detailing no net loss of wetland functions. In addition to applying all minimization measures, if a conservation easement corridor connects WDFW priority habitats within a wetland buffer with moderate habitat scores, a buffer reduction to 110 feet is allowed (Ecology 2018).

To align with the updated guidance, we recommend adopting the revised wetland buffers (Table 3-2) to pair with the existing impact minimization measures under LFPMC 16.16.320(A) to avoid inconsistent buffer application for future development proposals. If minimization measures cannot be met as prescribed, the middle column in Table 3-2 shown below can be used with the new habitat score distribution.

Table 3-2. Wetland buffer widths (in feet) under LFPMC 16.16.320, and under Ecology's most recent guidance (Ecology 2018).

Existing LFPMC Chapter 16.16.320(A)				Proposed Per 2018 Ecology Guidance						
Category	Habitat Scores			Without minimization measures			With minimization measures & habitat corridor			
	3-4	5	6-7	8-9	Habitat Score			Habitat Score		
	Buffer width (in feet) based on habitat score			Low (3-5)	Moderate (6-7)	High (8-9)	Low (3-5)	Moderate (6-7)	High (8-9)	
1	75	105	165	225	100	150	300	75	110	225
1*	190	190	190	225	250	250	300	190	190	225
2	75	105	165	225	100	150	300	75	110	225
3	60	105	165	225	80	150	300	60	110	225
4	40			50			40			

* bogs and wetlands of high conservation value

4. Consistency with Development Regulations and Comprehensive Plan

The Lake Forest Park Comprehensive Plan includes an Environmental Quality & Shorelines Chapter that includes goals and policies to provide guidance on balancing environmental protection and development. The current SMP is incorporated into the Shoreline Development and Access section by reference with the remainder of the goals and policies seemingly in line with SMP policy and regulation. A review of the current SMP and Comprehensive Plan was conducted to ensure consistency with only one minor change identified.

Table 4 below identifies a revision to improve consistencies between the SMP and Comprehensive Plan.

Comprehensive Plan			
#	Topic	Review and Relevant Location(s)	Action
1	Introduction – Goals & Policies – Planning Framework – Other Local Plan Guidance	Review: The soon to be old SMP is cited as “Shoreline Master Plan (2013)” in the Comprehensive Plan. Location: LFP Comprehensive Plan Volume I, page 9	Action Recommended: The City plans to recite the revised SMP adoption date to maintain consistency and clarity during the next Comprehensive Plan Update.

5. Other Issues to Consider

In addition to the issues discussed in the previous sections of this report, another issue in the current SMP could be addressed as part of the periodic update process to produce a more effective SMP. This issue is described in Table 5-1 below.

Table 5-1. Other issue that could be addressed to produce a more effective SMP.

#	Issue	Relevant Location(s) ¹	Review & Action
General			
1	Green roof requirement in shoreline jurisdiction	Review: The Shoreline Setback Reduction Alternatives Table 7.2 lists a green roof as an option for reducing setbacks, but it does not significantly address water quality issues as opposed to other low impact development techniques. Location: SMP Policy 5.3.8, Environmental Protection and Restoration (page 57) and Chapter 7.11, Residential Development (page 100)	Action Recommended: The City may consider removing this buffer reduction option, as the functional benefit of slowing runoff via a green roof on properties adjacent to Lake Washington is minimal.

6. References

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

Ecology (Washington State Department of Ecology). June 2016. Wetland Guidance for CAO Updates: Western Washington Version. Ecology Publication No. 16-06-001. Accessed November 2018. <https://fortress.wa.gov/ecy/publications/documents/1606001.pdf>