

OCEAN MANAGEMENT CHECKLISTS
(ORMA Requirements of WAC 173-26-360 and MSP Requirements)

PERIODIC REVIEW CHECKLIST

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**TABLE OF DRAFTED AMENDMENTS FOR
COSMOPOLIS SMP PERIODIC REVIEW**

for

**CITY OF COSMOPOLIS
SHORELINE MASTER PROGRAM
2023 Periodic Review**

February 27, 2023

Prepared For:

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Ocean Management Checklist

Review Considerations for Evaluating Ocean Use Policies, Regulations, and Procedures within Shoreline Jurisdiction

This document is intended to be filled out by local jurisdictions for use by Ecology shoreline planners reviewing local Shoreline Master Programs (SMPs) within Clallam, Jefferson, Grays Harbor, and Pacific Counties. The SMA guidelines (WAC 173-26-360) require that coastal county SMPs include ocean uses policies, regulations, and approval criteria consistent with the Ocean Resource Management Act (ORMA). The marine planning law (RCW 43.372.050(2)) requires that Ecology also review coastal county SMPs for consistency with the state's Marine Spatial Plan (MSP).

These checklists are intended to ensure that the SMP:

1. Implements the ORMA consistent with the specific provisions of [WAC 173-26-360](#).
2. Incorporates information, analyses, recommendations, and policies from the [Washington State Marine Spatial Plan](#).

Local SMPs on Washington's Pacific Coast are responsible for incorporating the Ocean Management Guidelines (WAC 173-26-360), which implement the ORMA (RCW 43.143) into their SMPs. The MSP provides information, analyses, recommendations, and policies that must be incorporated in local plans, regulations, and permit processes, particularly through local SMPs under the Shoreline Management Act. Given the purpose, authority, and intent of the marine planning law, all state and local agencies are required to implement and adhere to the adopted Marine Spatial Plan (MSP) through existing regulatory and decision-making processes at the state and local level. To make decisions consistent with the MSP, local governments on Washington's Pacific Coast will need to:

1. Review and, if necessary, update their local programs and incorporate information, analyses, recommendations, and policies from the MSP.
2. Once incorporated, issue shoreline permits for new ocean uses involving development (as defined in RCW 90.58.030(3)(a)) that are consistent with the updated SMP and, therefore, the MSP.



CHECKLIST 1 ORMA Requirements of WAC 173-26-360

This submittal checklist is designed to help in preparation and review of local Shoreline Master Programs (SMPs). It contains a list of required SMP components and provides a format for demonstrating how the SMP complies with the SMP Guidelines. This checklist will accompany the local government’s Comprehensive Update Checklist or Periodic Review checklist, as applicable per RCW 90.58.080.

This checklist is for use by local governments to satisfy the requirements of WAC 173-26-201(3)(a), relating to submittal of Shoreline Master Programs (SMPs) for review by the Department of Ecology (Ecology) under Chapter 173-26 WAC. The checklist does not create new or additional requirements beyond the provisions of that chapter.

How to use this checklist

This checklist summarizes key Ocean Management issues. See the associated *Guidance for Checklist 1 – ORMA* for a description of each item, relevant links, review considerations, and example language. Local governments should coordinate with their assigned [Ecology regional planner](#) for more information on how to use this checklist.

Prepared By		Jurisdiction	Date
AHBL, Inc.		Cosmopolis, WA	February 27, 2023
Item #	Summary of Ocean Management Requirements: <i>Ocean Resource Management Act - ORMA</i>	Review – Does the SMP contain this requirement. If yes, include reference to SMP section where this requirement is met.	Is the SMP, as proposed, Compliant? If not, describe action needed for compliance.
Geographical Area – consider including a map illustrating these areas for ease of implementation			
1	Clear identification of the geographical area where the Ocean Management provisions apply within the local jurisdiction. See WAC 173-26-360(2).	No, other than a reference to WAC 173-26-360.	The ORMA geographical area is described in general and as it applies to Cosmopolis in new Section 5.18 Ocean Management, paragraph 2 of intro. (See draft SMP dated 2/27/2023)

Item #	Summary of Ocean Management Requirements: <i>Ocean Resource Management Act - ORMA</i>	Review – Does the SMP contain this requirement. If yes, include reference to SMP section where this requirement is met.	Is the SMP, as proposed, Compliant? If not, describe action needed for compliance.
Definitions – consider including within the definition section of the SMP or integrating into a separate ocean management section.			
2	SMP includes definitions for the following terms consistent with the definitions in WAC 173-26-360: Ocean Use. WAC 173-26-360(3) Oil and gas uses and activities. WAC 173-26-360(8) Ocean mining. WAC 173-26-360(9) Energy production. WAC 173-26-360(10) Ocean disposal. WAC 173-26-360(11) Transportation. WAC 173-26-360(12) Ocean research. WAC 173-26-360(13) Ocean salvage. WAC 173-26-360(14)	No	Yes, Added to Section 8.02 (See draft SMP dated 2/27/2023)
Shoreline Environment Designation – Review the SED designation criteria, management policies, and use matrix to ensure internal consistency with WAC 173-26-360			
3	Appropriate shoreline environment designations (SEDs) are proposed for the ocean management geographical area of WAC 173-26-360.	Yes, Appropriate SEDs are proposed for the ocean management area and are represented in Appendix 1: Shoreline Environment Designation Map	Yes
Administration and Decision Making – consider including within the permit administration and/or a general ocean management section.			
4	Additional approval criteria of RCW 43.143.030 (2) for newly proposed ocean uses and developments. WAC 173-26-360(6)	No, other than Section 1.07 states “Ocean uses and activities conducted within the city’s and the state of Washington’s jurisdiction shall comply with RCW 43.143 (Ocean Resources Management Act) and WAC 173-26-360 (Ocean	Yes, Added a reference in Section 5.18 (See draft SMP dated 2/27/2023)

Item #	Summary of Ocean Management Requirements: <i>Ocean Resource Management Act - ORMA</i>	Review – Does the SMP contain this requirement. If yes, include reference to SMP section where this requirement is met.	Is the SMP, as proposed, Compliant? If not, describe action needed for compliance.
		Management). Nothing in this paragraph is intended to expand or modify the applicability of RCW 43.143, WAC 173- 26-360, or any subsections thereof, to ocean uses and activities not otherwise governed by those laws, administrative rules, or their subsections.”	
Ocean Management Policies – consider including these with Comprehensive Plan policies and/or a general ocean management section.			
5	General ocean management policies consistent with WAC 173-26-360(7).	No	Yes, added reference to New Section 5.18.01 (See draft SMP dated 2/27/2023)
Ocean Management Regulations – consider including within the Use section or integrating into a separate ocean management section.			
6	SMP includes the following specific use regulations:		
	a. Oil and gas uses and activities. WAC 173-26-360(8)	No	Added to ... 5.18.02(A) and Table 5-1
	b. Ocean Mining. WAC 173-26-360(9)	No	5.18.02(B) and Table 5-1
	c. Energy production. WAC 173-26-360(10)	No	5.18.02 (C) and Table 5-1
	d. Ocean disposal. WAC 173-26-360(11)	No	5.18.02 (D) and Table 5-1
	e. Transportation. WAC 173-26-360(12)	No	5.18.02 (E) and Table 5-1
	f. Ocean Research. WAC 173-26-360(13)	No	5.18.02 (F) and Table 5-1
	g. Ocean Salvage. WAC 173-26-360(14)	No	5.18.02 (G) and Table 5-1

CHECKLIST 2 Marine Spatial Plan (MSP) Requirements

This submittal checklist is designed to help in preparation and review of local Shoreline Master Programs (SMPs). It contains a list of required SMP components and provides a format for demonstrating how the SMP complies with the requirements of the Marine Waters Planning and Management Act found in RCW 43.372. This checklist will accompany the local government’s Comprehensive Update Checklist or Periodic Review checklist, as applicable per RCW 90.58.080.

This checklist is for use by local governments to satisfy the requirements of WAC 173-26-201(3)(a), relating to submittal of Shoreline Master Programs (SMPs) for review by the Department of Ecology (Ecology) under Chapter 173-26 WAC. The checklist does not create new or additional requirements beyond the provisions of that chapter.

How to use this checklist

This checklist summarizes key Ocean Management issues. See the associated *Guidance for Checklist 2 – MSP* for a description of each item, relevant links, review considerations, and example language. Local governments should coordinate with their assigned [Ecology regional planner](#) for more information on how to use this checklist.

Prepared By	Jurisdiction	Date	
AHBL, Inc.	Cosmopolis	February 27, 2023	
Item #	Summary of Marine Spatial Plan for Washington’s Pacific Coast (MSP) Requirements	Review – Does the SMP contain this requirement. If yes, include reference to SMP section where this requirement is met.	Is the SMP, as proposed, Compliant? If not, describe action needed for compliance.
Geographical Area and Applicability – consider including a map illustrating these areas for ease of implementation			
1	The SMP includes the following:		
	a. MSP Applicability Area. Clear identification of the geographical area where the Marine Spatial Plan information, analysis, policies, and regulations apply within the local jurisdiction. Include an applicability statement identifying when and where the MSP should be applied within the local jurisdiction.	No	Yes, The MSP applicability area is described in 5.18 Ocean management, intro paragraph 4. (See draft SMP dated 2/27/2023)
	b. Important, Sensitive and Unique Area (ISU). The current MSP ISU maps from the state along with identification of this	No	ISU mapping introduced as developed using best

Item #	Summary of Marine Spatial Plan for Washington’s Pacific Coast (MSP) Requirements	Review – Does the SMP contain this requirement. If yes, include reference to SMP section where this requirement is met.	Is the SMP, as proposed, Compliant? If not, describe action needed for compliance.
	information as the best available data. Include an applicability statement referencing the state ISU mapping resource.		available science in Section 5.18 Ocean management, intro paragraph 5. Applicability and mapping resource location further described in 5.18.02(H-I)
Definitions - consider including within the definition section of the SMP or integrating into a separate ocean management section.			
2	SMP includes definitions for the following terms consistent with the definitions in the MSP:		
	a. Important, Sensitive and Unique Areas (ISUs)	No	Yes, Added to Section 8.02 (See draft SMP dated 2/27/2023)
	b. New Ocean Uses	No	“
	c. The Marine Spatial Plan (MSP)	No	“
Administration and Decision Making – consider including within the permit administration and/or a general ocean management section.			
3	Describes how the MSP will be used to inform the evaluation of new ocean use and development proposals. The SMP should include a reference to the MSP as a resource for project review and the process for reviewing new ocean uses proposals as outlined.	No	Yes, added to New Section 7.04.06 (See draft SMP dated 2/27/2023)
Ocean Management Policies – consider including these with Comprehensive Plan policies and/or a general ocean management section.			
4	Use of the Marine Spatial Plan. The SMP should include a policy statement about how the SMP is informed by the MSP and how it will be used in permit review.	No	Yes, Added to New Section 5.18 Ocean management, intro paragraph 4.
Ocean Management Regulations – consider including within the Use section or integrating into a separate ocean management section.			
5	The SMP should contain ocean management regulations addressing the following:		
	a. Important, Sensitive and Unique Areas (ISUs) Designation. The SMP should contain ISU designation types and criteria consistent with the MSP.	No	Added to Subsection 5.18.02(H)

Item #	Summary of Marine Spatial Plan for Washington’s Pacific Coast (MSP) Requirements	Review – Does the SMP contain this requirement. If yes, include reference to SMP section where this requirement is met.	Is the SMP, as proposed, Compliant? If not, describe action needed for compliance.
			<i>(See draft SMP dated 2/27/2023)</i>
	b. ISU Protection standards. The SMP must apply ISU adverse effects and protection standards to new ocean uses and developments consistent with the MSP.	No	Added to Subsection 5.18.02(I) <i>(See draft SMP dated 2/27/2023)</i>
	c. Fisheries Protection standards. The SMP must apply fisheries protection standards to new ocean uses and developments consistent with the MSP.	No	Added to Subsection 5.18.02(J) <i>(See draft SMP dated 2/27/2023)</i>

SHORELINE MASTER PROGRAM PERIODIC REVIEW

Periodic Review Checklist: 2021 version

This document is intended for use by counties, cities and towns subject to the Shoreline Management Act (SMA) to conduct the “periodic review” of their Shoreline Master Programs (SMPs). The review is required under the SMA at [RCW 90.58.080\(4\)](#). Ecology rules that define the procedures for conducting these reviews include a requirement to use this checklist to ensure a successful review ([WAC 173-26-090](#)). By filling out this checklist, the local government is demonstrating compliance with the minimum scope of review requirements of WAC 173-26-090(2)(d)(ii). The checklist is organized into two parts.

Part One is used to identify how the SMP complies with current state laws, rules and guidance. This checklist identifies amendments to state law, rules and applicable updated guidance adopted between 2007 and 2021 that may trigger the need for local SMP amendments.

Part Two is used to document local review to ensure the SMP is consistent with changes to the local comprehensive plans or development regulations, and to consider changes in local circumstances, new information or improved data. As part of this periodic review the local government should include consideration of whether or not the changes warrant an SMP amendment.

How to use this checklist

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

Use the **review column** to document review considerations and determine if local amendments are needed to maintain compliance. See WAC 173-26-090(3)(b). Ecology recommends reviewing all items on the checklist.

Use the **action column** as a final summary identifying your final action taken to address the identified change in state law, rule or guidance. See WAC 173-26-090(3)(d)(ii)(D), and WAC 173-26-110(9)(b). This will likely include one of the following:

- Amendment proposed (include code citation);
- No amendment needed; or
- Not applicable.

Example

Row	Summary of change	Review	Action
2017a	OFM adjusted the cost threshold for substantial development to \$7,047.	21A.25.290B refers to the statutory thresholds, as amended by OFM.	No amendments needed.

For more information

Coordinate with [Ecology regional planner](#) for more information on how to use this checklist and conduct the periodic review.

Prepared By	Jurisdiction	Date
AHBL, Inc.	Cosmopolis, WA	2/27/2023

Part One: State laws, rules and guidance review

Part One is used to demonstrate compliance with WAC 173-26-090(2)(d)(i)(A). This checklist identifies amendments to state law, rules and applicable updated guidance adopted between 2007 and 2021 that may trigger the need for local SMP amendments during periodic reviews.*

Row	Summary of change	Review	Action
2021			
a.	The Legislature amended floating on-water residences provisions	Not applicable; floating homes are not allowed in Cosmopolis (Section 5.07.02(B)(8)).	No action needed.
b.	The Legislature clarified the permit exemption for fish passage projects	Section 7.04.04 references WAC 173-27-040 for exemptions. WAC 173-27-040 includes this exception.	No action needed.
2019			
a.	OFM adjusted the cost threshold for building freshwater docks	Section 1.06.02(C) says that the city will review all development proposals within shorelines of statewide significance for consistency with RCW 90.58.030.	No action needed.
2017			
a.	OFM adjusted the cost threshold for substantial development to \$7,047.	The cost threshold is outdated. Cost threshold should be updated in SMP Section 8 – Definitions.	Updated threshold to \$8,504 (the value effective July 1, 2022 per OFM filing with the State Register).
b.	Ecology permit rules clarified the definition of “development” does not include dismantling or removing structures.	The existing definition for “development” does not include this clarification. The definition should be updated according to the language in the checklist guidance.	Updated the definition of “development” according to the language in the checklist guidance.
c.	Ecology adopted rules clarifying exceptions to local review under the SMA.	The 2017 SMP does not include these exceptions. Section 1.05 should be updated according to checklist guidance.	Updated Section 1.05 to include item “F”, which outlines the exceptions to local review.
d.	Ecology amended rules clarifying permit filing procedures consistent with a 2011 statute.	The 2017 SMP includes “date of filing” instead of “date of receipt” for shoreline permits sent to Ecology, as required.	No action needed.

Row	Summary of change	Review	Action
		<p>The 2017 SMP includes requirement for simultaneous filing of Substantial Development, Conditional Use Permits, and/or variances in Section 7.02.03(A).</p> <p>The 2017 SMP does not go into detail into permit procedures so no review is needed to ensure consistency with required permit procedures in RCW 90.58.140(6).</p>	
e.	Ecology amended forestry use regulations to clarify that forest practices that only involves timber cutting are not SMA “developments” and do not require SDPs.	Forest practices are prohibited in all shoreline environmental designations in Cosmopolis.	Not applicable.
f.	Ecology clarified the SMA does not apply to lands under exclusive federal jurisdiction .	There are no lands under exclusive federal jurisdiction.	Not applicable.
g.	Ecology clarified “default” provisions for nonconforming uses and development .	The 2017 SMP does not include separate definitions for nonconforming use, nonconforming development/structure, and nonconforming lot. However, these changes are optional because the 2016 SMP includes provisions to address nonconforming uses.	No action needed.
2016			
a.	The Legislature created a new shoreline permit exemption for retrofitting existing structure to comply with the Americans with Disabilities Act .	Section 7.04.04 references WAC 173-27-040 for exemptions. WAC 173-27-040 includes this exception.	No action needed.
b.	Ecology updated wetlands critical areas guidance including implementation guidance for the 2014 wetlands rating system.	The 2017 SMP Appendix includes the current wetland ratings and buffers guidance.	No action needed.

Row	Summary of change	Review	Action
2015			
a.	The Legislature adopted a 90-day target for local review of Washington State Department of Transportation (WSDOT) projects.	This is not included in the 2017 SMP. Checklist guidance says it is not necessary to include in the SMP and reference is optional.	Added language from the checklist guidance to Section 7.03.
2012			
a.	The Legislature amended the SMA to clarify SMP appeal procedures .	The 2017 SMP does not include SMP appeal procedures. Checklist guidance says that no change is necessary if SMP appeal process is not outlined.	No action needed.
2011			
a.	Ecology adopted a rule requiring that wetlands be delineated in accordance with the approved federal wetland delineation manual .	The 2017 SMP includes the required language, as defined in the checklist guidance.	No action needed.
b.	Ecology adopted rules for new commercial geoduck aquaculture .	Commercial geoduck aquaculture is not possible within the city's shoreline jurisdiction and is prohibited, so no SMP amendments are needed.	No action needed.
c.	The Legislature created a new definition and policy for floating homes permitted or legally established prior to January 1, 2011.	Floating homes are not allowed in Cosmopolis (Section 5.07.02(B)(8)).	No action needed.
d.	The Legislature authorizing a new option to classify existing structures as conforming .	The 2017 SMP does not include this classification. The checklist guidance says it is optional to include.	No action needed.
2010			
a.	The Legislature adopted Growth Management Act – Shoreline Management Act clarifications .	The 2017 SMP includes a separate appendix for critical areas and shoreline areas.	No action needed.
2009			
a.	The Legislature created new "relief" procedures for instances in which a shoreline restoration project within a UGA creates a	Section 6.06.02 of the SMP references these procedures.	No action needed.

Row	Summary of change	Review	Action
	shift in Ordinary High Water Mark.		
b.	Ecology adopted a rule for certifying wetland mitigation banks .	Section 2.09.(E)(4)(b) allows credits from a state certified wetland mitigation bank to be used as mitigation.	No action needed.
c.	The Legislature added moratoria authority and procedures to the SMA.	The 2017 SMP does not include the moratoria procedures. The checklist guidance says that adding them is not necessary.	No action needed.
2007			
a.	The Legislature clarified options for defining "floodway" as either the area that has been established in FEMA maps, or the floodway criteria set in the SMA.	Section 1.06.01 includes floodways as areas established by FEMA. The definition of "floodway" in Section 8 also references areas established in effective FEMA flood insurance rate maps or floodway maps.	No action 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 2017 SMP includes a list of waterbodies subject to the SMP (Section 1.06).	No action needed.

* See additional considerations for Ocean Management within Ecology's Ocean Management Checklist and associated guidance for using the Ocean Management Checklist. This checklist and guidance summarizes state law, rules and applicable updated information related to Ocean Resources Management Act (ORMA) and the Washington State Marine Spatial Plan (MSP). All jurisdictions with coastal waters must implement ORMA and the MSP applies to all jurisdictions that overlap with the MSP Study Area. Clallam County, Jefferson County, Grays Harbor County, Pacific County, Ilwaco, Long Beach, Raymond, South Bend, Cosmopolis, Ocean Shores, Hoquiam, Aberdeen, Westport need to plan for ocean uses consistent with ORMA and the MSP and should be using the Ocean Management Checklist in addition to this Periodic Review Checklist.

Part Two: Local review amendments

Part Two is used to demonstrate compliance with WAC 173-26-090(2)(d)(ii). This checklist identifies changes to the local comprehensive plans or development regulations, changes in local circumstances, new information or improved data that may warrant an SMP amendment during periodic reviews.

Changes to Comprehensive Plan and Development regulations

Question	Answer		Discussion
Have you had Comprehensive Plan amendments since the SMP comprehensive update that may trigger need for an SMP amendment?	<input type="checkbox"/>	Yes	No Comprehensive Plan amendments were made that may trigger the need for an SMP amendment.
	<input checked="" type="checkbox"/>	No	
Have your had Development Regulations amendments since the SMP comprehensive update that may trigger need for an SMP amendment?	<input type="checkbox"/>	Yes	No Development Regulations amendments were made that may trigger the need for an SMP amendment.
	<input checked="" type="checkbox"/>	No	
Has your Critical Areas Ordinance (CAO) been updated since the SMP comprehensive update? If yes, are there changes that trigger need for an SMP amendment?	<input type="checkbox"/>	Yes	No updates have been made to the CAO that may trigger the need for an SMP amendment. It appears a CAO is not codified.
	<input checked="" type="checkbox"/>	No	
Are CAO provisions incorporated by reference (with ordinance # and date) into your SMP? If yes, is it the current CAO or a previous version?	<input type="checkbox"/>	Yes	None.
	<input checked="" type="checkbox"/>	No	
Has any new shoreline area been annexed into your jurisdiction since your SMP was updated? If yes, were these areas pre-designated?	<input type="checkbox"/>	Yes	No new shoreline area has been annexed.
	<input checked="" type="checkbox"/>	No	
Other	<input type="checkbox"/>	Yes	Cosmopolis has the previous SMP (from 1976) codified as CMC Chapter 15.08 and a Grays Harbor Estuary Management Plan (from 1988) codified as CMC Chapter 15.12 . The new (once revised) SMP should now be codified as CMC 15.08 or instead a reference should be made to the current regulations as adopted. (with <u>repealing language</u> for Ord. 639 and Ord. 882 in either case.) This does not impact the SMP itself however.
	<input type="checkbox"/>	No	

If your review and evaluation resulted in proposed SMP text or map amendments, please create a table that identifies changes to the SMP for consistency with amendments to the Comprehensive Plan and Development regulations. Example format:

SMP Section	Summary of proposed change	Citation to any applicable RCW or WAC	Rationale for how the amendment complies with SMA or Rules

Changes to local circumstance, new information, or improved data

Question	Answer	Discussion
Has your jurisdiction experienced any significant events, such as channel migration, major floods or landslides that impacted your shoreline and could trigger a need for an SMP amendment?	<input type="checkbox"/> Yes	Cosmopolis experienced flooding in January 2022. Flooding occurred in the usual area along Mill Creek near F, G, H, and I Streets. No landslides or major damage occurred. The event does not trigger an SMP amendment.
	<input checked="" type="checkbox"/> No	
Have FEMA floodplain or floodway maps been recently updated for your jurisdiction? If your SMP extends shoreline jurisdiction to the entire 100-year floodplain, has FEMA updated maps that trigger a need for an SMP amendment?	<input checked="" type="checkbox"/> Yes	FEMA floodplain maps were updated in 2020 for Grays Harbor County. AHBL investigated the changes and found that the FEMA updated maps do not trigger any changes needed for the shoreline jurisdiction / SED mapping.
	<input type="checkbox"/> No	
Have you issued any formal SMP Administrative Interpretations that could lead to improvements in the SMP?	<input type="checkbox"/> Yes	No formal SMP Administrative Interpretations have been issued.
	<input checked="" type="checkbox"/> No	
Are there any Moratoria in place affecting development in the Shoreline?	<input type="checkbox"/> Yes	There are no moratoria in place in Cosmopolis.
	<input checked="" type="checkbox"/> No	
Have staff identified the need for clarification based on implementation or other changes? e.g., modifications to environment designations, mapping errors, inaccurate internal references.	<input type="checkbox"/> Yes	Staff have had not identified a need for clarification.
	<input checked="" type="checkbox"/> No	
Are there other changes to local circumstances, new information, or improved data that need to be addressed in your SMP?	<input type="checkbox"/> Yes	No changes that City Staff is aware of.
	<input checked="" type="checkbox"/> No	

If your review and evaluation resulted in proposed SMP text or map amendments, please create a table that identifies changes to the SMP to address changes to local circumstances, new information, or improved data. Example format:

SMP Section	Summary of proposed change	Citation to any applicable RCW or WAC	Rationale for how the amendment complies with SMA or Rules

TABLE OF DRAFTED AMENDMENTS FOR COSMOPOLIS SMP PERIODIC REVIEW

SMP Section	Summary of proposed change	Citation to any applicable RCW or WAC	Rationale for how the amendment complies with SMA or Rules
Various, including Appendix 2	Various grammatical improvements	N/A	N/A - The changes don't change the meaning but increase readability
Section 8 – Definitions	Updated the cost threshold for substantial development in the definitions section.	OFM adjusted the cost threshold for substantial development effective July 1, 2022	The cost threshold was outdated.
Section 8 – Definitions	Updated the definition of “development” to not include dismantling or removing structures.	Ecology permit rules clarified the definition of “development” does not include dismantling or removing structures.	The existing definition for “development” does not include this clarification. The definition should be updated according to the language in the checklist guidance.
Section 8 – Definitions	Updated the definition of the following per Ecology’s Guidance document: <ul style="list-style-type: none"> • Bog • Isolated Wetlands • Mature Forested Wetland • Native Vegetation 	N/A	The updated definitions are per Ecology guidance document and therefore should comply with the SMP and Rules.
Section 8 – Definitions	Consolidated definitions for “off site” and “on site” and “in kind” compensation into one definition to more closely match the SMP text	N/A	N/A
Section 8 – Definitions	Removed the definition for Priority Species, Threatened Species, Sensitive Species, and Endangered Species; updated the definition for “Proposed, Threatened, Sensitive and Endangered Species”	WAC 232-12-014, 232-12-011 and 232-12-297 all no longer exist WAC 220-610-010 is now cited	N/A

SMP Section	Summary of proposed change	Citation to any applicable RCW or WAC	Rationale for how the amendment complies with SMA or Rules
	and for “Species, Priority” and so forth		
Section 8 – Definitions	Removed the definition for Wetland Mosaic because the term is not used in the SMP	N/A	N/A
Section 8 – Definitions	Updated the definition for Wetland or Wetland Areas	RCW 36.70A.030 and WAC 365-190-030	“If permitted by the county or city” added for aligning with WAC 365-190-030
Section 8 - Definitions	Added definitions for all of the following: <ul style="list-style-type: none"> • Ocean Use • Oil and gas uses and activities • Ocean mining • Energy production. • Ocean disposal • Transportation • Ocean research • Ocean salvage 	WAC 173-26-360	Per ORMA
Section 8 - Definitions	Added definitions for all of the following: <ul style="list-style-type: none"> • ISUs • New Ocean Uses • The MSP 	N/A	Per MSP
1.04	Added information about the 2023 periodic review process.	N/A	N/A; this simply describes the process used for the 2023 periodic review.
1.05(F)	Added an outline of the exceptions to local review.	Ecology adopted rules clarifying exceptions to local review under the SMA.	The 2017 SMP did not include these exceptions and should be updated according to checklist guidance.
5.18 – NEW SECTION	Added ORMA geographical area description	WAC 173-26-360(2)	Per ORMA
5.18.01	Added statement that ocean management policies are consistent with WAC 173-26-360(7)	WAC 173-26-360(7)	Per ORMA
5.18.02	Added regulations for Ocean Management	WAC 173-26-360	Per ORMA
Table 5-1	Added Ocean Uses to the Use Table	WAC 173-26-360	Per ORMA

SMP Section	Summary of proposed change	Citation to any applicable RCW or WAC	Rationale for how the amendment complies with SMA or Rules
5.18	Added MSP applicability language and policy reference, ISU protection standards references and fisheries protection standards	N/A	Per MSP
6.07.02(B)(1)(c)	Edited as follows: <i>Replacement of greater than 50 percent or 35 feet of the linear length of an existing shoreline stabilization structure, whichever is smaller, as measured on a cumulative basis since the structure was established, is not considered repair or maintenance, and is considered a new structure.</i>	WAC 173-26-231(3)(a)(iii)(C)	The edits preserve flexibility for homeowners with existing shoreline stabilization structures consistent with WAC 173-26-231(3)(a)(iii)(C).
7.04.06	Added language about MSP for project review	N/A	Per MSP
7.06.02(C)	Edited as follows: <i>If the revision involves a shoreline variance or conditional use, which was conditioned by Ecology, the revision must be reviewed and approved by Ecology under the SMA.</i>	WAC 173-27-100	The phrase “was conditioned by Ecology” should not be there because anything that was a shoreline variance or condition use that has a revision needs to be reviewed and approved by Ecology.
7.03	Added info about 90-day target for local review of WSDOT projects.	The Legislature adopted a 90-day target for local review of WSDOT projects.	This is not included in the 2017 SMP. Checklist guidance says it is not necessary to include in the SMP and reference is optional.
Appendix 2 Section 1.11(B)(5) and (6)	Edited as follows: <i>5. Compensating for the impact by replacing, enhancing or providing substitute areas and environments and replacing the ecological processes and functions of the resource; and</i>	N/A	The edits will ensure improved conformance to the SMA.

SMP Section	Summary of proposed change	Citation to any applicable RCW or WAC	Rationale for how the amendment complies with SMA or Rules
	<p>6. <i>Monitoring the required compensation impact and taking appropriate remedial or corrective measures when necessary.</i></p>		
<p>Appendix 2 Section 2.07</p>	<p>Updated Tables 2-1 and 2-3 to say “if Table 2-2 [is / is not] implemented and Corridor Provided” and we updated the buffer widths based on Ecology guidance documents / new scoring schemes</p>	<p>N/A</p>	<p>The edits will ensure improved conformance to the SMA.</p>
<p>Appendix 2 Section 6.06</p>	<p>Edited as follows: <i>Habitat management plans shall be forwarded to WDFW and similar appropriate state and federal agencies for their comments at the discretion of the city.</i> Bald eagle management plans shall comply with Bald eagle protection rules in accordance with WAC 232-12-292.</p>	<p>N/A</p>	<p>Bald Eagle delisted from State Sensitive - February 4, 2017 a. 2011: Downlisted from State Threatened to Sensitive (this ended the requirement to develop Bald Eagle Protection Plans per WAC 220-610-100) b. 2007: Delisted from federal Threatened (but still covered by the federal Bald and Golden Eagle Protection Act)</p>