

MEMORANDUM - WDFW Riparian Management Guidance

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To: Trevor Martin, Planning Manager, City of Yakima, WA

From: Jennifer Groos, Environmental Planner III, Perteet, Inc.
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Date: December 1, 2025

Re: Yakima Critical Areas Ordinance (CAO) Periodic Update
WDFW Riparian Management Guidance

1.0 SUMMARY

This technical memorandum supplements the Fish and Wildlife Habitat Conservation Area (FWHCA) section of the City of Yakima's Critical Area Ordinance (CAO) Gap Analysis and Best Available Science (BAS) Review report dated October 2025. The memo further supports continued compliance with GMA's required process for the 2026 Comprehensive Plan Periodic Update cycle. In accordance with the Washington State Growth Management Act (GMA), the purpose of this memo is to specifically consider BAS for riparian ecosystems to be incorporated into Chapter 15.27 of the Yakima Municipal Code (YMC). Furthermore, this memo is intended to be an overview of the BAS concerning FWHCAs including guidance regarding the Washington Department of Fish & Wildlife (WDFW) Riparian Management Zones (RMZs), and Site Potential Tree Height (SPTH), as well as a comparison of considerations made by other local jurisdictions in which a flexible approach was warranted. This report does not review WDFW guidance as related to the City of Yakima's Shoreline Master Program (SMP) in Title 17 of the YMC (RCW Chapter 90.58). Therefore, Type I Waters as designated in YMC 15.27.505 (and listed in Table 3 of this report) are not part of this review due to their designation as "shorelines of the state" per RCW Chapter 90.58.

2.0 Regulatory Basis

The Revised Code of Washington (RCW) 36.70A.040 and the Washington Administrative Code (WAC) 365-196-830 require the designation and protection of critical areas and their ecosystems based on preserving the functions and values of the natural environment and safeguard the public from health and safety hazards. Additionally, RCW 36.70A.172 requires the designation and preservation of critical areas to be based on best available science and includes special consideration of measure necessary to preserve or enhance anadromous fisheries.

3.0 WDFW RMZ Guidance

The WDFW has published multiple BAS resources and guidance related to RMZs, including but not limited to:

- **Riparian Ecosystems Vol. 1 (Quinn, 2020):** Identifies BAS regarding ecological functions of riparian areas and management measures necessary to maintain them.
 - **Riparian Ecosystems Vol. 2 (Rentz et al., 2020):** Identifies recommendations for how local governments can include BAS in protecting riparian ecosystems and associated aquatic habitats.

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- **Site Potential Tree Height Guidelines (2025):** Recommends implementation of riparian management zones (RMZ) through utilizing arboreal species-specific site-potential tree heights (SPTH200) or the extent of native riparian vegetation, whichever is greater, along with a 100-foot minimum to ensure pollutant-removal functions.
- **Riparian Management Zone Checklist (2023):** Details performance measures and additional protective measures for CAO updates.

While the City of Yakima’s existing provisions for stream buffering/setbacks and channel migration zones provide a baseline level of protection, they do not align with WDFW’s 2020 Riparian Ecosystems BAS (Quinn, 2020), the 2020 Site Potential Tree Height (SPTH) guidance (WDFW, 2025), or the 2023 RMZ Checklist.

Recent WDFW guidance on SPTH (WDFW, 2025) recommends that additional protections to designate riparian ecosystems should also be considered based on associated arboreal/forested systems and WDFW RMZ recommendations (Rentz et al., 2020). Designation of riparian ecosystems/habitats as a FWHCA through the use of RMZs ensures protection of the ecological functions of aquatic habitats, further supporting both fish-bearing riparian habitats (anadromous fish habitats) and non-fish-bearing habitats. Protection of these habitats support temperature regulation, nutrient cycling, pollution prevention, bank stabilization, water quality protection, terrestrial wildlife movement corridors, and climate resilience.

The functional properties listed in YMC 15.27.504 support RMZs related to site specific circumstances where the protection of riparian function and values necessitate a larger buffer as a protective measure, such as poor soil conditions, steep slopes or stormwater runoff that can contribute to and deposit pollutants within riverine habitats.

WDFW’s Riparian Ecosystems guidance, Vol. 2, Section 2.3.5 (Rentz et al., 2020) indicates that while site-potential tree height (SPTH) may apply in the limited areas of the Columbia Plateau where tall riparian trees occur, this condition is uncommon. In most dryland settings, riparian management zones are more appropriately delineated based on the extent of riparian vegetation and the pollution-removal functions they provide, with a minimum 100-foot width generally cited as necessary to achieve effective pollutant reduction (WDFW Riparian Ecosystems, Vol. 2, Section 1.4 (Finding/Rec. #5-b/c) (Rentz et al., 2020).

In Yakima, FWHCA occur in a semi-arid shrub-steppe landscapes characteristic of the Columbia Plateau. Riparian systems along the Yakima River, Naches River, and tributaries provide essential functions even in the absence of tall coniferous forests. This setting requires a regulatory framework that predominantly emphasizes pollutant removal, water quality protection, and habitat connectivity over tree-height-based metrics that are not ecologically applicable in shrub-steppe habitats due to a lack of tall forested systems.

Specifically, standard SPTH buffers at a minimum of 200-feet, with the arboreal species-specific tree heights ranging from 123 to 300-feet , may not be a suitable measure for the riparian habitats of the semi-arid shrub-steppe landscape of the Columbia Plateau. Alternatively, the remaining ecological values and functions in absence of tall forested systems along Yakima’s riparian areas could be supported by the designation of FWHCA RMZs based on WDFW recommendations (Rentz et al., 2020).

Comprehensively, the WDFW’s guidance documents establish that while SPTH is the preferred scientific measure, BAS supports a flexible approach where ecological conditions (e.g., shrub-steppe) make implementation of SPTH standard buffers inapplicable.

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Due to the unique complexities of Yakima’s regional and localized ecosystems as well as potential social and economic impacts within the City of Yakima, the recommendations listed in section 4, Table 1 of this memo should be preliminary considerations for alignment with WDFW riparian ecosystems related to implementation of RMZs, SPTH practices, and their associated values and functions in conjunction with other critical area designations.

4.0 Yakima CAO Recommendations

The following recommendations include one Primary Recommendation and six Sub-recommendations. The Primary Recommendation is provided as a consolidated list of WDFW recommendations to ensure overall consideration of WDFW BAS and guidance related to RMZs and SPTH practices as expressed in WDFW Riparian Ecosystems, Vol. 2, Section 1.4 – Key Findings and Recommendations (Rentz et al., 2020). While the Primary Recommendation suggests three actions for overall consideration in implementation of RMZ protective measures, the subsequent Sub-recommendations provide more specific actions and further defines how the Primary Recommendation can be successfully implemented.

Table 1. RMZ-Related Recommendations

Code Section	Reason/Consistency	Recommendation
Primary Recommendation 15.27.510 – Vegetative Buffers	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	Consider implementation of RMZ protective mechanism recommended by WDFW BAS & guidance for riparian habitat management: • Designation as critical area, • Establish RMZ buffer widths, • Require RMZ delineation to all stream types.
Sub-recommendation A 15.27.510 – Vegetative Buffers	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	(A) Consider performing an RMZ/SPTH analysis across city riparian habitats based on stream typology and geological soil types in order to evaluate if vegetated buffers contain quality functions and values to support SPTH standard buffer widths.
Sub-recommendation B 15.27.510 – Vegetative Buffers	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	(B) Consider establishing RMZ delineation criteria.
Sub-recommendation C 15.27.510 – Vegetative Buffers	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	(C) Consider designation of riparian habitat for fish-bearing and non-fish-bearing streams.
Sub-recommendation D Article V. Land Modification Development Standards	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	(D) Consider establishing a RMZ minimum 100-foot pollution removal overlay identifying area that should be evaluated based on site-specific conditions due to the potential to hold riparian habitat functional properties

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		when soil type, soil stability, slope, pollution removal, and stormwater contributions are taken into consideration.
Sub-recommendation E Article V. Land Modification Development Standards	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	(E) Consider including protective provisions for placement OSS within stream buffer and/or riparian habitats.
Sub-recommendation F 15.27.315(A)(I) – Supplemental Report Requirements for Specific Critical Areas	(Quinn, 2020); (Rentz et al., 2020); (WDFW, 2025); WDFW RMZ Checklist	(F) Consider conditional provisions when geotechnical hazards within the delineation of RMZ buffer measurements such as when slopes and topography are part of the habitat feature.

4.1 Riparian Management Zone

Primary Recommendation: Consider implementing RMZ protective measures consistent with WDFW guidance (Rentz et al., 2020) to ensure site specific, science-based management of riparian areas. Recommended actions include:

- Designating riparian habitats as critical areas.
 - WDFW Riparian Ecosystems, Vol. 2, Section 1.4, Finding/Rec. 1 (Rentz et al., 2020).
- Establishing RMZ widths according to site-specific conditions, such as slope, vegetation, stormwater, channel characteristics, and site-specific terrestrial species.
 - WDFW Riparian Ecosystems, Vol. 2, Section 1.4, Finding/Rec. 2-5, & 7-8 (Rentz et al., 2020).
- Requiring RMZ delineation steps to all streams, including both fish-bearing or non-fish bearing streams.
 - WDFW Riparian Ecosystems, Vol. 2, Section 1.4, Finding/Rec. 6 (Rentz et al., 2020).

The definition of riparian ecosystems according to WDFW Vol. 2 guidance (Rentz et al., 2020) is as follows, “Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e., a zone of influence).”

The above primary recommendation serves as the primary consideration for alignment with WDFW BAS and guidance. The following sub-recommendations should be considered as supplement and in support of the suggested protective measures listed in the primary recommendation.

Sub-recommendation A: It is recommended that the City of Yakima consider performing an RMZ/SPTH alternative buffer analysis across city riparian habitats based on Ecology’s Permanent Stream Typing System. This effort will support evaluation of potential alternative buffer widths as site-specific or dependent upon unique RMZ functions and values, as well as provide an opportunity to compare geospatial differences in implementing WDFW’s RMZ and SPTH standard buffer guidance in contrast with Yakima’s existing stream buffer thresholds. Additionally, the SPTH buffer analysis should include consideration of RMZs in relation with floodplain CMZs and riparian habitats covered under Yakima’s SMP or designated as shorelines of the state.

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Sub-recommendation B: Consider establishing RMZ delineation criteria, in which its boundaries are derived based on the presence of a CMZ, OHWM, or other functional properties listed in YMC 15.27.504, whichever is more restrictive. Delineation criteria can be further defined as a result of the above recommended SPTH alternative buffer analysis.

Sub-recommendation C: Consider designation of riparian ecosystems in support of the FWHCA Riparian Management Zone, regardless of whether they are fish-bearing or non-fish bearing.

Additionally, YMC 15.27.504 does address aquatic fish and wildlife habitat conservation areas as able to provide the functional property of “filtering solids, nutrients, and harmful substances,” but does not directly address pollution removal. In situations where the RMZ width is less than 100-feet, the overlay of a 100-foot pollution removal delineation would provide additional opportunities for this functional protection.

If the SPTH alternative buffer analysis results in recommendations for alternative buffer widths less than the WDFW recommended standard buffer widths, the City should further consider adoption of a RMZ minimum 100-foot buffer provision with mechanisms for reducing buffers, increasing buffers, and management of disconnected buffers. Additionally, the city should anticipate potential need for supplemental development regulations to address buffer condition criteria and vegetated buffer enhancement measures through requiring the use of Habitat Management Plans and mitigation sequencing, or other adaptive management framework.

Sub-recommendation D: Consider establishing RMZ buffer widths in combination with a minimum 100-foot pollution removal overlay based on site-specific conditions that hold riparian habitat functional properties where soil stability, slope, pollution removal, stormwater contributions, and site-specific terrestrial species are taken into consideration when determining the extent of riparian functions.

4.2 Onsite Sewage Systems

While provisions for the placement of onsite sewage systems (OSS) with floodplain hazard areas and CARAs are present in Chapter 15.27 of the YMC, Part Five (FWHCAs) does not address OSSs within riparian habitats. WDFW BAS recommendations suggest utilizing HMPs to ensure protections are provided from contaminating waterways, for establishing setback requirements according to WAC 246-272A, and for allowing design, installation, operation, maintenance, and monitoring in according with State Department of Health regulations and standards.

Sub-recommendation E: Consider including protective provisions for placement OSS within riparian habitats.

4.3 Bank Stabilization

While provisions for designating RMZs are not present in Chapter 15.27 of the YMC, provisions for bank stabilization within FWHCAs and outside of shoreline jurisdictions are present in YMC 15.27.513. These provisions address threats to property, structures, and facilities, as well as professional supervision, minimum protective measures, the use of fill, design, material selections and alternatives for maintaining natural character.

Sub-recommendation F: Consider establishing a conditional provision that includes slope, topographic, and/or geotechnical hazards as part of delineating RMZ buffer measurements.

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5.0 Pollution Removal Overlay Preliminary Review

For better comprehension, and before considering implementation of a 100-foot Pollution Removal Overlay/Buffer on all fish-bearing and non fish-bearing streams and waterbodies, it is important to cross reference industry-based terminology regarding water typing systems. The City of Yakima's CAO currently utilizes the Interim Water Typing System with numbered designations as depicted in WAC 222-16-031. As part of Yakima's CAO Gap Analysis and BAS Review, the city's water typing system has been recommended to be updated to a Permanent Water Typing System as required through WAC 222-16-030. Table 2 provides a comparison of current and recommended water typing systems, as well as noting Yakima's current buffer widths and the WDFW recommended minimum pollution prevention overlay/buffer.

Table 2. Water Typing System Comparison

Current Interim Typing System (YMC 15.27.505)	Current Buffers (YMC 15.27.510 – Table 27.5-1)	Recommended Permanent Water Typing System (WAC 222-16-030)	WDFW Minimum Pollution Removal Overlay/Buffer
Type 1 Water*	(See Table 09.030-1 in YMC 17.09.030(P))*	Type "S"*	100-Feet*
Type 2 and 3 Water	100-Feet/50-Feet	Type "F"	100-Feet
Type 4 Water	25-Feet	Type "Np"	100-Feet
Type 5 Water	Not Regulated	Type "Ns"	100-Feet

* Not included in this assessment of FWHCAs RMZ; Applicable to Title 17 of the YMC (Shoreline Master Program Regulations).

Two map graphics have been created to provide a preliminary and high-level graphic representation of areas across the city that would be potentially affected by the recommended implementation of a minimum 100-foot pollution removal overlay. The two maps utilize a combination of city-available GIS data for streams and creeks, partial GIS data for the Washington Department of Natural Resources (DNR) waterbodies, and Ecology's Planning-Level CMZ GIS dataset.

Image 1 represents the city's publicly available and existing stream data through the use of city's 'streams and creeks' dataset, DNR's 'waterbodies' dataset representing riparian-related and other potential waterbodies that would support riparian habitat applicable under the FWHCAs critical area designation, and Ecology's identified CMZ boundaries. It is important to note that the DNR's 'waterbodies' dataset may include bodies of water that may be considered man-made and not be applicable to wetland, stream, or FWHCA critical area regulations. Additionally, Type "S" waterbodies have been removed from the original DNR 'waterbodies' dataset. This partial DNR dataset has been included to help represent waterbodies with riparian functions and values that are not considered 'shorelines of the state' (Type "S" shorelines are separately regulated by the city's Shoreline Master Plan). As shown in Image 1, the DNR's 'waterbodies' dataset only includes Type F, N (Np/Ns), and X classifications as assigned by DNR. The subsequent Image 2 represents areas across Yakima's jurisdiction that would potentially be affected by the implementation of a minimum 100-foot pollution removal overlay by applying an 100-foot buffer offset to each of the dataset mentioned above..

Together, the two map images (Images 1 and 2) should be used to further understand the need for a specific RMZ/SPTH analysis or assessment (Sub-recommendation A) to evaluate potential impacts to future development activity, private properties, and economic development in proximity to the identified areas. Therefore, locations highlighted in Image 2 have not been fully evaluated and their qualification as a designated

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critical area needs to be reviewed individually through further analysis. An RMZ/SPTH analysis or assessment would also need to consider impacts to underserved communities, agriculture/ag tourism, and properties that could result in a non-conforming property or structure status.

Image 1. Watercourses, Waterbodies, and CMZ Map

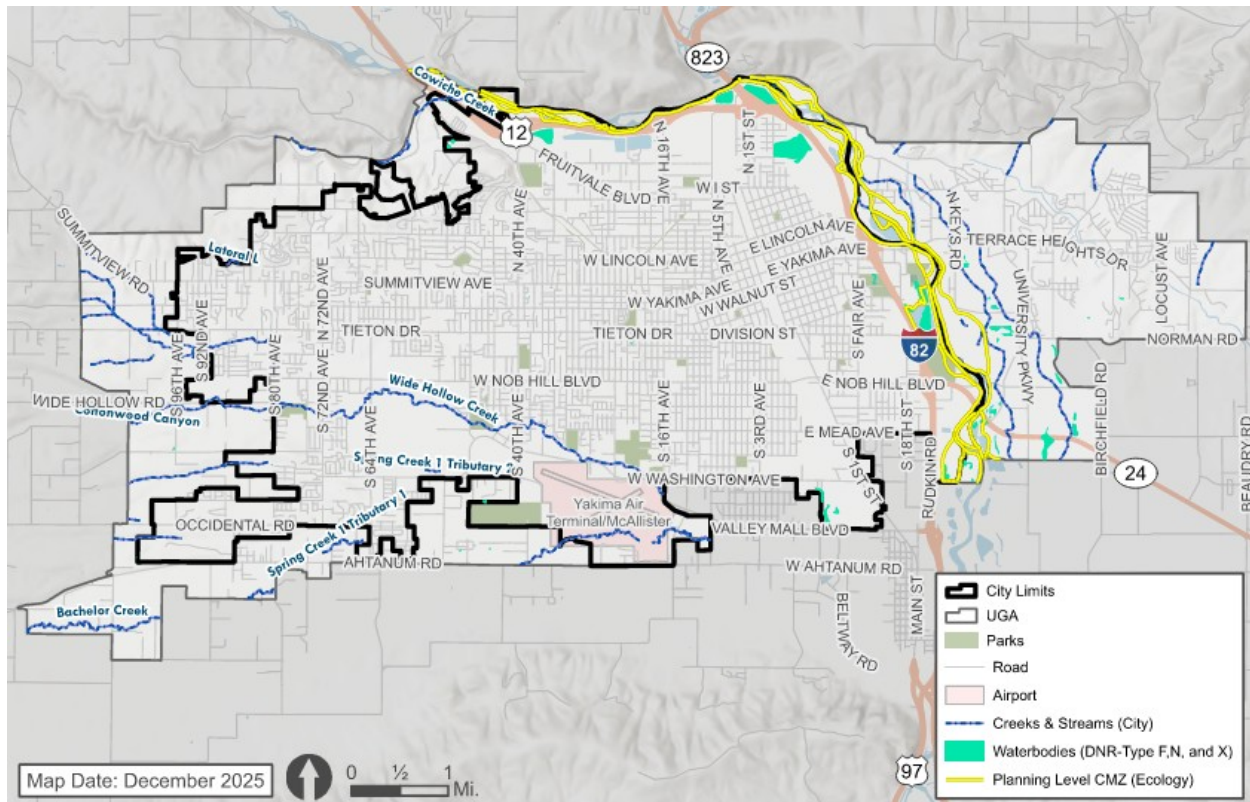
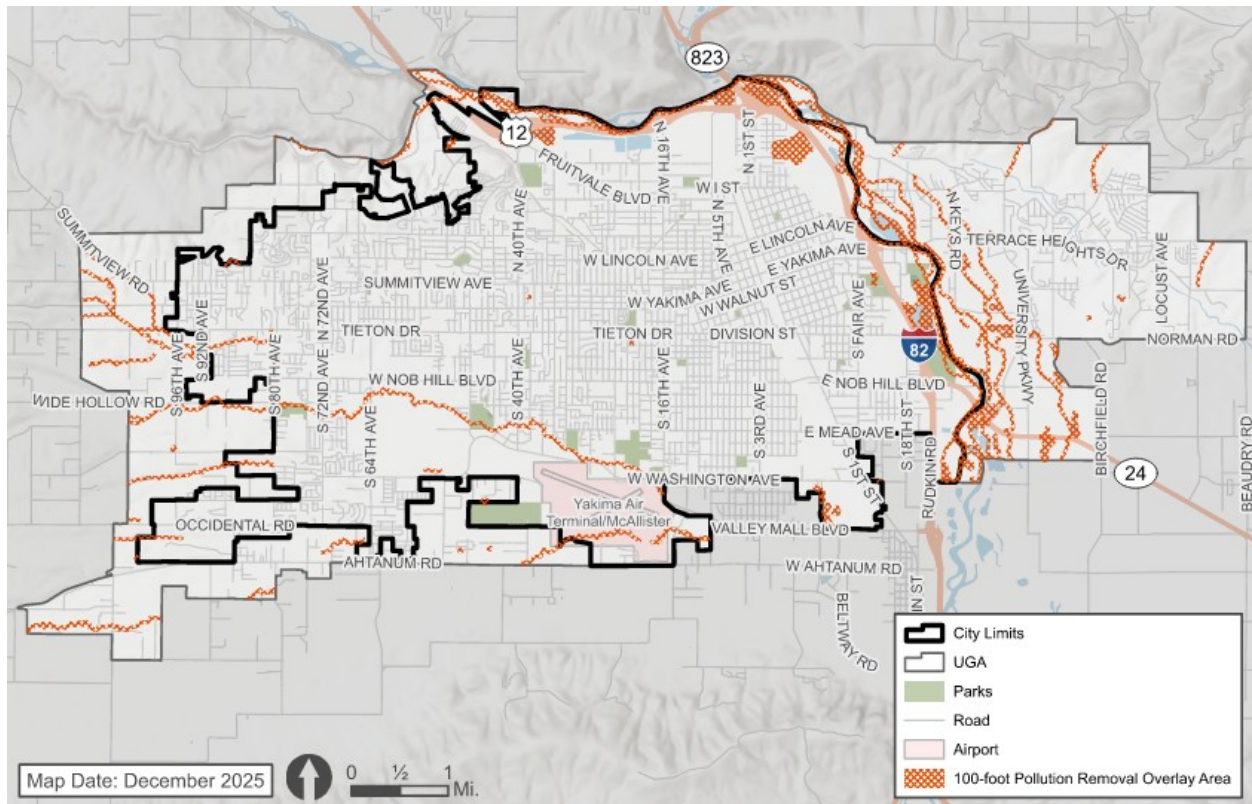


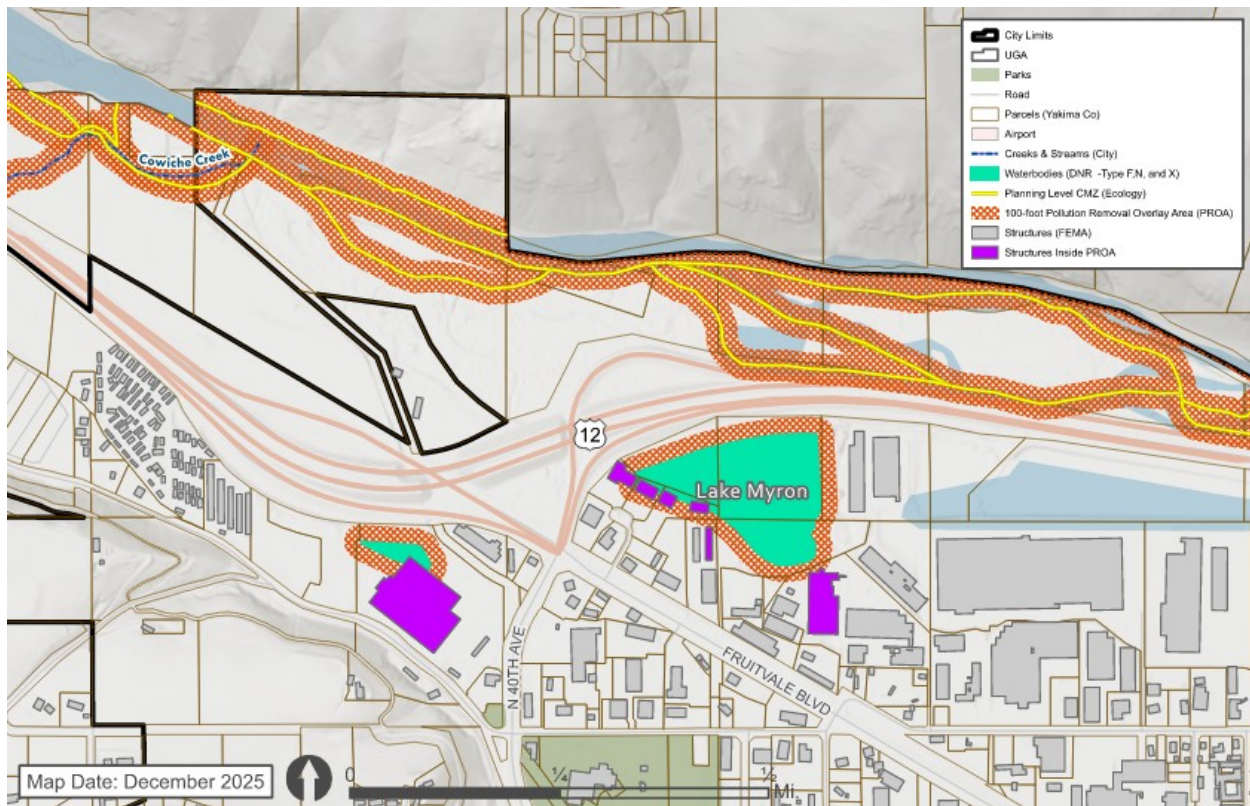
Image 2. Minimum 100-Foot Pollution Removal Overlay Map



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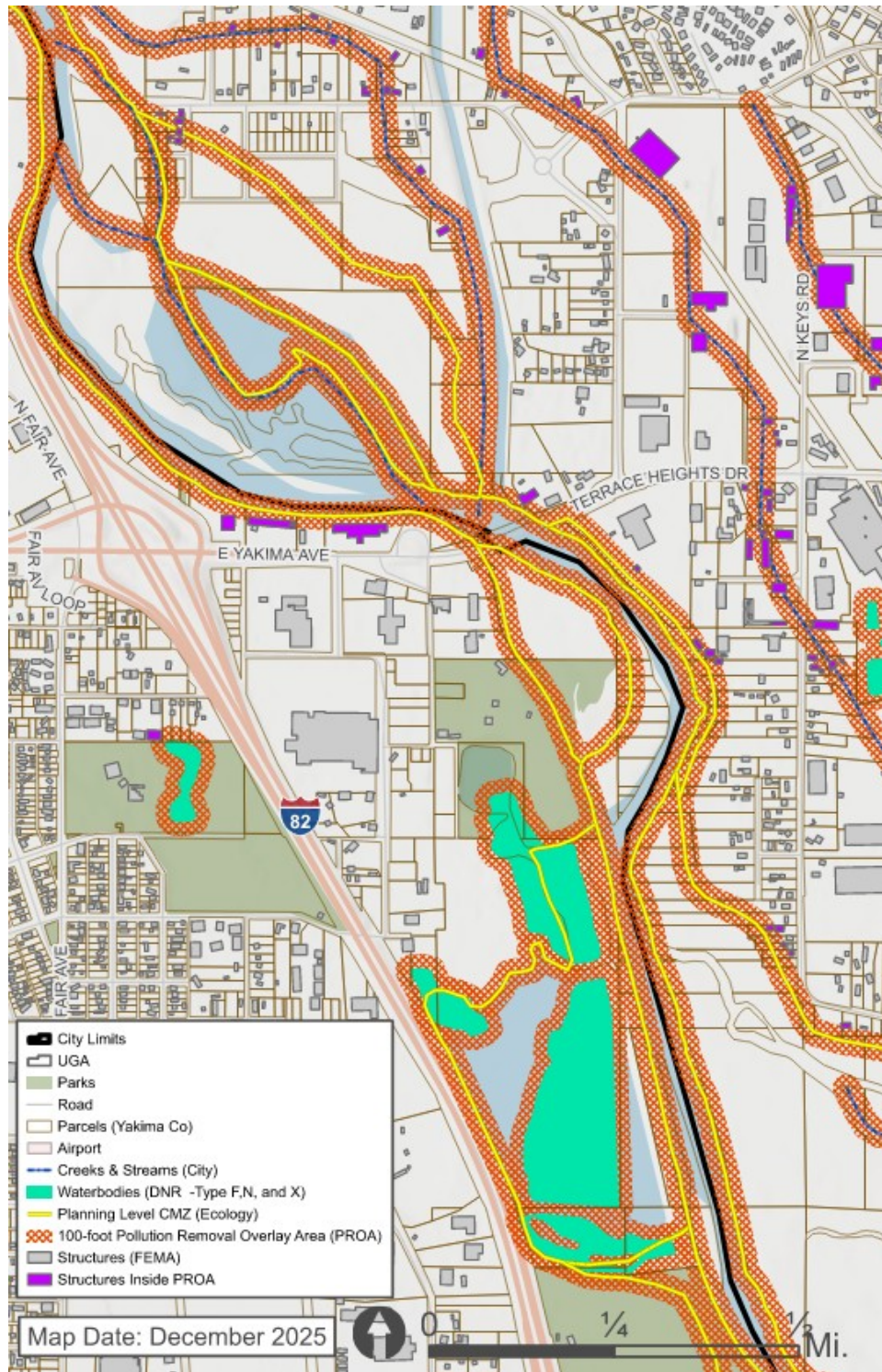
Alternatively, four additional map images (Images 3 through 6) have been included as focus areas for better understanding the potential of individual properties being affected. Each of these four map images represents a specific area of Yakima in which the 100-foot Pollution Removal Overlay Area (PROA) may influence future development activity. The four map images should also be used as a preliminary review of lots, structures, or land uses that may no longer conform to development standards as a result of implementing a 100-foot PROA.

Image 3. Focus Area: US Hwy 12 / Fruitvale Blvd.



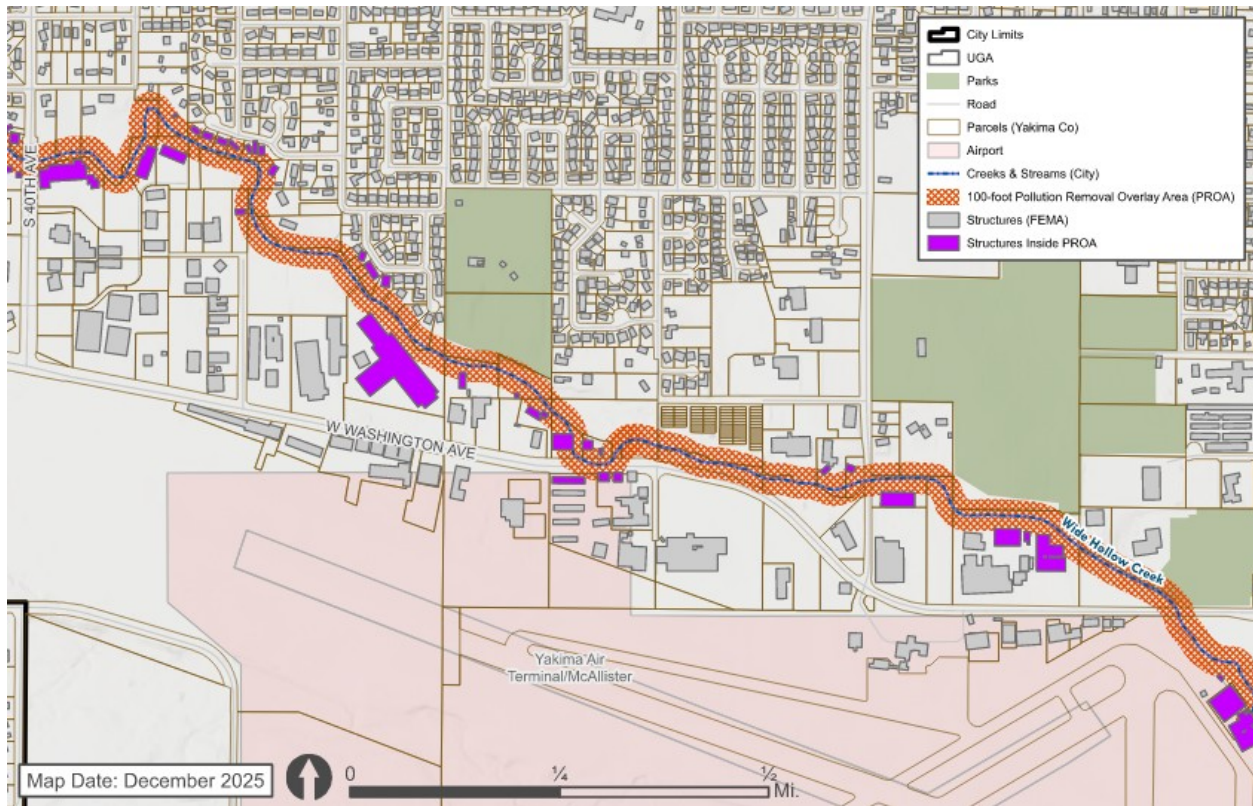
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Image 4. Focus Area: I-82 / Yakima Ave. / Terrace Heights Blvd.



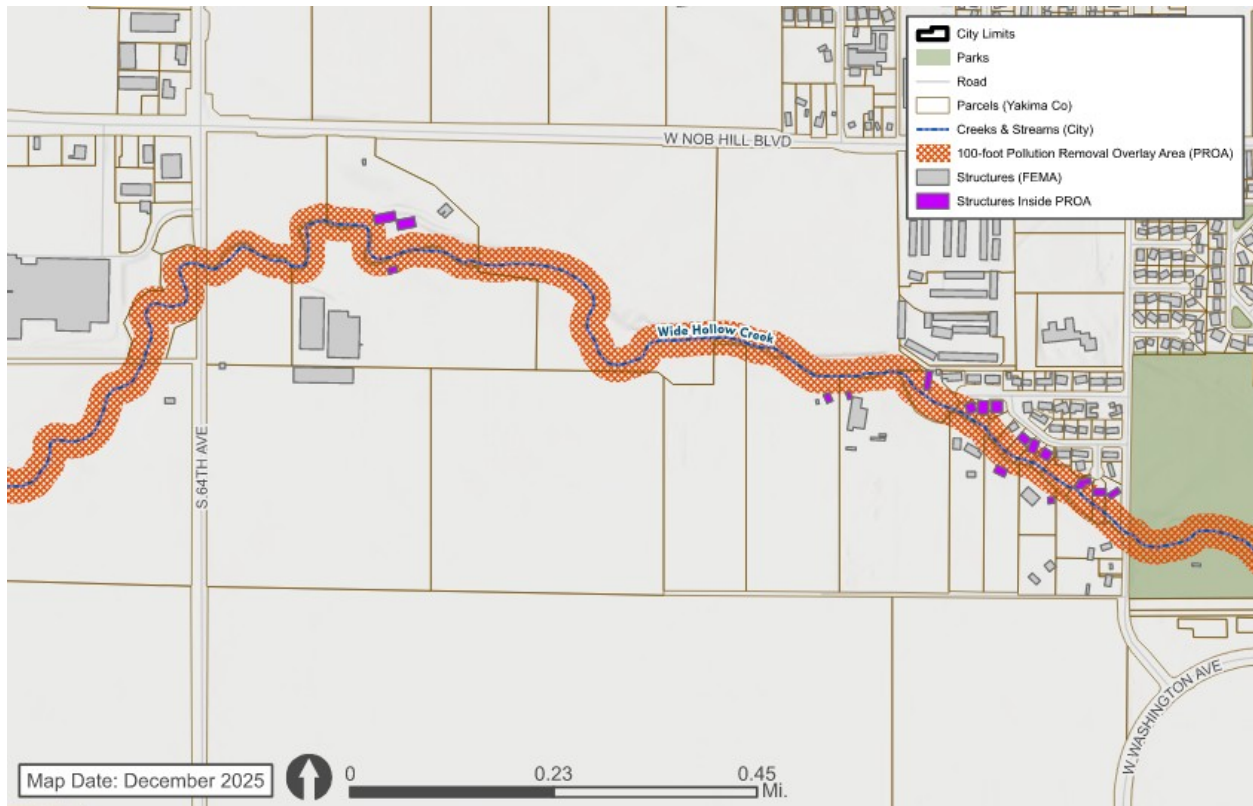
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Image 5. Focus Area: Yakima Air Terminal/McAllister / W. Washington Ave.



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Image 6. Focus Area: S 64th Ave. / W Nob Hill Blvd. / W. Washington Ave.



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6.0 Case Studies

Since most other local jurisdictions within Washington State are also considering WDFW BAS and guidance as part of their Comprehensive Plan & CAO Periodic Update, the following case studies are included to better understand how RMZ/SPTH implementation methods are being evaluated and/or adopted. Special consideration should be given to Kittitas County due to their similar relative location within the Columbia Plateau region (dryland environment). While not located within a dryland environment, the other case studies referenced below are provided for further reference related to their methods for designation, buffer width measurement, and alternative provisions for assessing site-specific conditions.

Table 3. Comparison of Implementation Methods by Other Local Jurisdictions

Jurisdiction	Source	Riparian Habitat Designation	Method of Measure	Std. SPTH Buffer	Min. 100-ft Buffer	Alternative Provisions for Site-Specific Conditions
Kitsap County	Technical Guidance & Ord. 633 (2024)	Fed. & State (PHS) identified species & habitats, and “Areas targeted for preservation by the federal, state and/or local government which provide fish and wildlife habitat benefits...” (KCC 19.300.310(B)(4)(a)(ii))	OHWL or CMZ	General Buffer Alternative (KCC 19.100.315 (A)(3) [Voluntary Provision])	All Stream Types shown 100-ft or more in Stream Buffer Width Table Matrix	• Buffer Averaging • UGA Alternative Buffer Widths • Increased Buffers • Disconnected Buffers • Exemptions & Std. for Existing Dev. • Mitigation Sequencing • Reasonable Use Exceptions • Variance Criteria
Kittitas County	Codified Ord. 2025-006, KCC Chapter 17A.04	Fed. & State (PHS) identified species & habitats, “...and areas associated with state priority species.” (KCC 17A.04.020(I)(d); RMZ Defined (Native Growth Protection Areas)	OHWL, CMZ, or Active Floodplain	SPTH or Min. 100-ft Buffer, whichever is greater	SPTH or Min. 100-ft Buffer, whichever is greater	• Increased RMZ / Upland Habitat Buffers • RMZ / Upland Habitat Buffer Averaging • Non-aquatic Habitat Buffers
Mountlake Terrace, WA	Gap Analysis Technical Guidance (2025)	Rec: Provide a FHWCA definition.	Rec: OHWL or CMZ	Rec: Utilize SPTH delineation methods	Rec: Min. 100-ft Buffer for Pollution Prevention & Removal	• Rec: Monitoring Program and Contingency Plan for FWHCAs. • Mitigation Plans/Sequencing • Exempt Activities & Alteration to Critical Areas • Reasonable Use Exceptions • Variances
Sumner, WA	Codified Ord. 2909 (2024)	RMZ Defined (SMC 16.04.060)	OHWL	Min. 100-ft Buffer on all stream types.	Min. 100-ft Buffer on all stream types.	• Buffer Reductions (Not below 75-ft) • Partial Exemptions • Monitoring Plans • Variance Criteria

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6.1 Kitsap County

Two references were used to assess Kitsap County's CAO update, a WDFW Riparian Management Guidance technical memorandum, drafted by DCG/Watershed (currently known as Facet) in 2023 and Kitsap County's Ordinance # 633 (2025), Title 19 CAO. The technical memorandum provided similar recommendations as noted in this memo including use of BAS and guidance from WDFW for riparian ecosystems, designation of riparian ecosystem as a critical area, establishment of RMZ widths/buffers, and methods for RMZ delineation regardless of related fish-bearing status. Review of the CAO ordinance shows that the County revised buffer measurement methods to include the CMZ, overlapping adjacent wetland buffers, and slope/topographic features of influence, where applicable. A provision referred to as the 'General Buffer Alternative' is provided as a voluntary alternative method for deriving a site-specific buffer according to WDFW SPTH modeling methods. UGA Alternative Buffer widths are also provided with conditional requirements for limited circumstances. Use of licensed professionals and Habitat Management Plan are implemented throughout these provisions. Additionally, conditional provisions are provided for buffer reductions including implementation of mitigation sequencing, percentage-based reductions for specific land uses, buffer averaging, variance processes, as well as methods for addressing increased buffers and disconnected buffers.

6.2 Kittitas County

Kittitas County's critical area ordinance contained provisions for Riparian Management Zones in 2021 as a result of Ordinance 2021-016, and recent codified efforts related to Ordinance 2025-006 made changes to all sections of Chapter 17A.04 (Fish and Wildlife Habitat Conservation Areas). The historical background regarding Ord. 2025-006 is the result of efforts to update the County's CAO in 2021 and included a series of petitioning and appeals in relation with the Yakama Nation for review by the Eastern Washington Growth Hearings Board (GMHB). Although, it is evident through a comparison of the prior version of the County CAO that amendments included added references to state regulations, added references to 'BAS', revised descriptions to the RMZs, their buffers/widths, measurement methods, and vegetated conditions. Conditions triggering increased RMZs also include project sites *"...within or adjacent to documented anadromous fish spawning or rearing habitat."* (YCC 17A.04.030(7)).

6.2 City of Mountlake Terrace, WA

Reference to the City of Mountlake Terrace's efforts to update the critical area ordinance include technical guidance from 2025 as provided by Facet (formerly DCG/Watershed) in the Critical Areas Ordinance Gap Analysis report. Subsequently, Facet provided a technical memorandum in July 2025 for SPTH Analysis, similar to the recommendation made in this memo in Section 5. Recommendations in the report included a 100-foot buffer to protect water quality for all streams, buffer condition and native vegetation enhancement requirements if/when buffers are chosen to be less than recommended by WDFW, and management of disconnected buffers.

6.3 City of Sumner, WA

The City of Sumner's critical area ordinance was amended in 2024 with Ordinance # 2909. Amongst the amendments the adoption of a clear definition of the RMZ was included along with provisions for requiring a Habitat Management Plan, management of disconnected buffers, and requiring a Resource, Wildlife, and Hazard application process for certain regulated activities, all as protective design and management measures. While variance criteria and a related review process already existed in the city's CAO, a provision was added to specifically require other agencies with jurisdiction in addition to the US Fish and Wildlife Service, and the

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National Marine Fisheries Service, to receive a notice of application for variances regarding the reduction of buffer widths for Type F streams. Provisions addressing alterations to buffer widths include buffer reduction criteria and partial exemptions.

7.0 References

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8.0 Glossary

BAS – Best Available Science
CAO – Critical Area Ordinance
CMZ – Channel Migration Zone
DNR – Washington Department of Natural Resources
FWHCA – Fish & Wildlife Habitat Conservation Area
GIS – Geographic Information System
GMA – Growth Management Act
HMP – Habitat Management Plan
OHWM – Ordinary High-Water Mark
OSS – Onsite Septic System
PHS – Priority Habitat Species
PROA – Pollution Removal Overlay Area
RCW – Revised Code of Washington
RMZ – Riparian Management Zone
SMP – Shoreline Master Plan
SPTH – Site Potential Tree Height
UGA – Urban Growth Area
WAC – Washington Administrative Code
WDFW – Washington Department of Fish & Wildlife
YMC – Yakima Municipal Code