May 8, 2013

Washington State Department of Ecology
Attention: Director’s Office
PO Box 47600
Olympia WA 98504-6700

RE: Town of Steilacoom Comprehensive Shoreline Master Program Update

Dear Director Bellon:

The Steilacoom Town Council approved language for the new Shoreline Master Program at its meeting on May 7. All but one of the required changes and all of the recommended changes that were attached to your letter of March 27 were approved. The Council approved alternative language to the one required change, detailed below. The Council also approved a change to language the Town had previously submitted to the Department.

1. Alternate language regarding required change.

The Department required the Town to add an Appendix A consisting of the Town’s Critical Areas Ordinance. The Town has no objection to the Appendix, but the description of the CAO the Department used only references the last amendment to the CAO, and does not include the main body of the ordinance.

Item A of Attachment B required the following language:

Part 7- Appendices

The Council has approved the following alternate language:

Part 7 - Appendix
Town staff believes that the above language more correctly describes the Town’s CAO, and is consistent with the scope of the original submittal, SMA policy and the applicable guidelines.

2. Alternate language for vegetation conservation section.

At the Town Council’s public hearing on April 16, 2013, a member of the public voiced concerns over the language in certain portions of the Vegetation Conservation section, contending that the language was not narrowly tailored to vegetation conservation alone. The language objected to was approved by the Town Council in September of 2012, and sent to the Department in October 2012.

At their meeting on May 7, 2013, the Town Council approved the following changes to the vegetation conservation policies and regulations.

16.08.610 Vegetation Conservation

A. Policies
6. Development proposals that require extensive vegetation removal to create for purposes including, but not limited to creating views or expansive lawns should not be allowed. The Town should allow selective clearing for views and lawns such purposes only when slope stability and ecological functions are not compromised. Trimming and pruning are preferred over removal of native trees and shrubs. Shoreline landowners may not be guaranteed an unobstructed view of the water.

B. Regulations
1. General
   a. The Town shall allow limited and selective clearing for purposes including, but not limited to creating views and lawns when slope stability and ecological functions are not compromised. Techniques shall include pruning, windowing and other measures that preserve plant composition and structure. No more than twenty-five (25) percent of a single tree’s leaf bearing crown may be removed and no more than twenty-five (25) percent of the canopy cover of any stand of trees may be removed for view preservation. If additional trimming is requested in subsequent years, the cumulative removal may not exceed 25% within any 4 year period.

Town staff believes that the above language is consistent with the scope of the original submittal, SMA policy and the applicable guidelines.
Thank you for considering these alternatives. The Town looks forward to your reply so that we can adopt the new Shoreline Master Program.

Sincerely,

[Signature]

Doug Fortner
Town Planner

cc: Mayor Lucas
    Paul Loveless
    Chrissy Bailey