Lake Cushman Shoreline Management Plan Update

Sept. 20, 2019

Presented by:

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Wildlife and Lands Manager

Wynnae Wright
Shoreline and Lands Coordinator
Meeting Purpose

• **Share information** about Tacoma Power’s Shoreline Management Plan update
• **Highlight key changes** being considered
• **Gather input** to consider with the Plan update
• **Answer questions**
• **Provide information** on how to submit comments
Background

Where does the Shoreline Management Plan apply?

**Tacoma Power/Cushman Co. Lease Terms**

10-foot Lateral Strip (Lake Cushman)

- Development Lot
- Cushman Hydroelectric Project Area
  (Authorization required for most uses – consult with Tacoma Power)
- Elevation 742'
- Elevation 738' (full pool)
- Unvegetated lake shore/bottom

Placement of fill and/or permanent structures
requires Tacoma Power authorization within
the 10' lateral strip on development lots.

[Diagram of lease terms and elevation details]
Background

Where does the Shoreline Management Plan apply?

742 feet elevation

Low Bank Examples
Background

Where does the Shoreline Management Plan apply?

742 feet elevation

High Bank Examples
Background

- The Cushman Hydroelectric Project operates under a license issued by the Federal Energy Regulatory Commission (FERC).
- FERC required us to implement a Shoreline Management Plan (SMP) and make updates when necessary.
- SMPs provide consistency and keep our shorelines clean and safe.
- SMPs are reviewed every six years to see where they can be improved.
- This is the first review since our SMP was implemented.
SMP and SUSPG Revisions

Cushman Hydroelectric Project
FERC Project No. 460

STORELINE USE SPECIFICATIONS AND PERMITTING GUIDELINES

Cushman Hydroelectric Project
FERC Project No. 460

STORELINE MANAGEMENT PLAN

Prepared by Kleinschmidt

TACOMA POWER
TACOMA PUBLIC UTILITIES
It’s Time For an Update! Why?

• Better alignment with Mason County regulations
• Address new situations and clarify language of existing ones
• Remove impractical conditions
• Improve layout and format
• Improve permitting process
What Has Been Accomplished?

• Obtained initial community feedback on scope of update and changes (Dec. 2017)
• Completed review of Mason County SMP alignment
• Staff review of proposed changes - in process
• Draft proposed changes for stakeholder review

(We are here!)
Presentation and Handouts

Format Key

- **Underline**: new language
- **Strikethrough**: removed
- **Italics**: comments
- **(...)**: additional language
- **✓**: County alignment*

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### Image Description

- **Table**
  - Columns: **Column 1**, **Column 2**, **Column 3**, **Column 4**, **Column 5**
  - Values: **Value 1**, **Value 2**, **Value 3**, **Value 4**, **Value 5**

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### Presentation Context

- **Title**: Presentation and Handouts
- **Format Key**
  - Underline: new language
  - Strikethrough: removed
  - Italics: comments
  - (...): additional language
  - ✓: County alignment*

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### Handouts

- **Table**
  - Columns: **Column 1**, **Column 2**, **Column 3**, **Column 4**, **Column 5**
  - Values: **Value 1**, **Value 2**, **Value 3**, **Value 4**, **Value 5**

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**Note**: The images provided are placeholders for the actual content of the presentation and handouts. The format keys indicate how the content is to be interpreted for the audience.
## Plan Update

### Key Highlights

<table>
<thead>
<tr>
<th>Plan Change</th>
<th>Why?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Standard Terms List</strong></td>
<td>• Added definition to provide clarity.</td>
</tr>
<tr>
<td>Construction license: The legal instrument</td>
<td>• Relies on County construction process steps and clarifies that</td>
</tr>
<tr>
<td>Tacoma Power issues to shoreline lessees and</td>
<td>Tacoma Power permit will not be issued until permitted construction</td>
</tr>
<tr>
<td>their contractor(s) to permit construction</td>
<td>and Tacoma Power inspection are complete.</td>
</tr>
<tr>
<td>activities on Tacoma Power properties.</td>
<td>• Clarify permitting process.</td>
</tr>
<tr>
<td>Construction licenses will not be issued until</td>
<td></td>
</tr>
<tr>
<td>all regulatory permits are in place. All work</td>
<td></td>
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<tr>
<td>allowed under the construction license must be</td>
<td></td>
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<tr>
<td>completed and approved by Tacoma Power and</td>
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<tr>
<td>the regulatory agencies prior to issuance of a</td>
<td></td>
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<tr>
<td>Shoreline Use Permit.</td>
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</tbody>
</table>
## Plan Update

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<table>
<thead>
<tr>
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<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td>Clarifies that only those lots which existed at the time of approval of initial SMP are eligible for SUP’s.</td>
</tr>
<tr>
<td>Eligible Applicants for Shoreline Use Permits are: 1. owners/lessees of property adjacent to Tacoma Power’s shoreline lands as identified on the Shoreline Management Classification (SMC) maps. 1.1. Future subdivision of eligible lots does not create new eligibility.</td>
<td></td>
</tr>
<tr>
<td><strong>Campfires</strong></td>
<td>Align with State law, U.S. Forest Service guidance, and all regulatory burn bans when in effect.</td>
</tr>
<tr>
<td><em>Move section from Exempt Activities to Permissible Shoreline Uses.</em></td>
<td></td>
</tr>
<tr>
<td>Tacoma Power allows will permit small recreational campfires no more than three feet in diameter in approved fire rings within the “A”, “B”, and Resource Management shoreline classifications. Campfires must not be are prohibited below the high water line of the lake, in hike-in camp areas, and in Resource Management classification. All campfires must comply with any burn bans may be in effect.</td>
<td></td>
</tr>
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<tr>
<td><strong>Prior Existing Uses</strong></td>
<td>Recognizes that change of ownership should not trigger removal or reconfiguration of structures that would otherwise be eligible for permitting as a Prior Existing Use.</td>
</tr>
<tr>
<td>(...) Permitted Prior Existing Uses become subject to the most current permitting criteria established under the SMP when the use:</td>
<td></td>
</tr>
<tr>
<td>1. Requires replacement (either voluntary or due to natural disaster).</td>
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<tr>
<td>2. Changes ownership</td>
<td></td>
</tr>
<tr>
<td>3. Undergoes substantive modification (greater than 50 percent of replacement in footprint or value of all <em>any</em> individual structures including pilings, landings, decking area, etc., based on Tacoma Power’s estimate). The degree of construction complexity and effort factors into value estimate.</td>
<td></td>
</tr>
<tr>
<td>4. Undergoes successive, small modifications that cumulatively exceed 50 percent replacement in footprint or value within a five-year period.</td>
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<td><strong>Prohibited Activities</strong>&lt;br&gt;Tacoma Power provides the following list of prohibited structures, uses, and activities within the Project Boundary for guidance purposes; it is not an exhaustive or complete list. If a proposed use is not listed in Table 45.1 of the SMP and is not listed in this section, it is assumed prohibited unless otherwise confirmed by Tacoma Power. <strong>This list of prohibited activities does not apply to prior existing uses that are subject to a valid shoreline use permit issued by Tacoma Power and subject to the conditions of Section 4.4 &quot;Prior Existing Uses&quot; (...)</strong>&lt;br&gt;Clarifies difference between prohibited activities and those that have been authorized as Prior Existing Uses.&lt;br&gt;Maintains consistency with changes to Prior Existing Use language.</td>
<td></td>
</tr>
<tr>
<td><strong>Processing Fees and Permit Terms</strong>&lt;br&gt;Prior Existing Use Permits cannot be transferred to new owners without the uses complying with current shoreline use requirements.&lt;br&gt;Maintains consistency with changes to Prior Existing Use language.</td>
<td></td>
</tr>
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Plan Change

**Add term and definition:**
Skirting: Solid barrier built around in-water structures which prevent the natural flow of water and wildlife.

**Design (Private/Single Family Docks)**
Tacoma Power prohibits the following design features and uses: (...) Skirting around docks. Features other than skirting designed to block large woody debris from becoming entangled under shoreline structures will only be considered if designed to allow free movement of fish and wildlife under and through the structure.

**Add to prohibited design features:**
Exposed rebar, new concrete float rests, exposed styrofoam, tires used as bumpers or floats.

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<tr>
<td>Conforms to County ordinance and supports Tacoma Power operational and environmental goals.</td>
</tr>
<tr>
<td>Align with Mason County Ordinance 17.50.320 (B)1(j) and (B)2(f)(ii) Repair and Replacement, and Docks and Unattached Floats.</td>
</tr>
<tr>
<td>Addresses common design issues.</td>
</tr>
</tbody>
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Plan Update

Example: Skirting vs. Blocking

**Skirting** = Solid barrier. Restricts natural water and fish movement.

**Blocking** = Allows for natural water and fish movement while blocking large woody debris.
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<td><strong>Flotation</strong>&lt;br&gt;New materials used for flotation must conform to regulatory agency requirements. Pursuant to WDFW requirements, flotation for structures must be enclosed and contained to prevent the break-up or loss of flotation material into the water. Open celled, bead-board type polystyrene is susceptible to damage from fish and wildlife, is damaged by wind and wave action easily, presents an ingestion hazard to wildlife, and creates litter and other aesthetic nuisances. To protect the environmental values within the Cushman Project, open celled, bead-board type polystyrene is not an approved flotation material for docks. (…) Floats must be designed to prevent flotation from becoming abraded or damaged by the lakebed. If float rests are used, Tacoma prefers they be attached to the floating docks. Float rests shall not extend beyond the dock footprint.</td>
<td>Conforms to County ordinance and supports Tacoma Power operational and environmental goals. Align with Mason County Ordinance 17.50.320 (B)2(f)(viii)(b) Floats. Addresses common design issues.</td>
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Example:
Float rests extending beyond footprint of float
# Plan Update

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| **Shoreline Stabilization Measures**  
*Revise Section 4.0 to clarify:* shoreline stabilization measures may be allowed to protect existing permitted structures and may not be permitted to protect existing structures which do not conform to current Tacoma Power SMP requirements.  
*Revise to state:* shoreline stabilization measures shall be the minimum size and footprint required to serve the intended purpose.  
*Revise Section 4.1 to clarify the following:* only one new bulkhead toe repair (footing replacement) is permitted in certain cases; when removal of existing bulkheads being replaced is required; that replacement of failed bulkheads is permitted in the same size/dimension and shall not encroach further waterward; and that any changes to location, size or dimensions shall be subject to "new bulkhead" requirements.  
| Tacoma Power proposes to extensively revise SUSPG Appendix B Section 4 to conform to Mason County ordinance and regulations.  
Requirements specific to Tacoma Power goals and policies are retained in specific instances as needed.  
Align with Mason County Ordinance 17.50.340 (A) and (B). |
Plan Update

Example: Bulkhead toe repair
## Plan Update

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<td><strong>Mooring Buoys</strong> (...) Tacoma Power will only consider allowing private mooring buoys on Lake Cushman within the “A” or “B” shoreline classification. At Lake Cushman, Tacoma Power will consider private buoys under the following circumstances: 1. When a mooring buoy is in lieu of a dock; 2. When an existing dock does not adequately accommodate boat mooring; 2. When associated with a Public or Community recreation site. Tacoma Power will review Permit applications on a case by case to determine if they qualify for a buoy. (...)&lt;br&gt;&lt;br&gt;<em>Add:</em> To accommodate boat mooring during low reservoir levels, Tacoma Power will allow one &quot;mooring buoy alternative&quot; per eligible development lot. A mooring buoy alternative consists of a permanent anchor, anchor chain, removable non-floating line, and optional small line recovery float. See attached diagrams.</td>
<td>Supports Tacoma Power operational goals while accommodating lots that have boat access only. Removes ambiguous language. Clarifies the buoy alternative by describing it in a new section of SUSPG Appendix B. This differs from Mason County's Ordinance 17.50.320 (B)3(e) regarding regulation of mooring buoys. A 2-page diagram will be added to the SUSPG with more details on mooring buoy alternatives.</td>
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<td><strong>Floating Booms</strong></td>
<td>Enhances clear communication and usefulness of SMP documents.</td>
</tr>
<tr>
<td>Retain existing language.</td>
<td>Clarifies SMP intent.</td>
</tr>
<tr>
<td>Add: Floating booms may also be permitted when associated with boat-in only lots.</td>
<td></td>
</tr>
<tr>
<td><strong>Fee Schedule</strong></td>
<td>Not feasible for Tacoma Power to bill on an annual basis. Application fee will be due at time of application.</td>
</tr>
<tr>
<td>STRUCTURAL BULKHEAD: $750 application fee / $100 annual fee</td>
<td>Note: Tacoma Power is not currently charging re-application fees while we work toward bringing all shoreline uses and structures under permit.</td>
</tr>
<tr>
<td>NON-STRUCTURAL BULKHEAD: $300 application fee / $50 annual fee</td>
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<td><strong>Stairways and Walkways</strong></td>
<td>Recognizes challenges of steep terrain in some locations, while conforming to County ordinance and supporting Tacoma Power aesthetic and public use goals.</td>
</tr>
<tr>
<td>Located landward of OHW: Tacoma Power allows stairways or walkways that are freestanding or incorporated into a permissible path to provide walking access to the OHW line of the reservoir. To maintain the natural aesthetic of the Project reservoirs, Tacoma Power requires that such structures be constructed of dry laid stone, wood, or wood with loose stone, gravel or wood chips.</td>
<td>Align with Mason County Ordinance 8.52.170 (E)4(k) Stairs, Upland.</td>
</tr>
<tr>
<td>Located waterward of OHW: Tacoma Power may permit stairs and landings waterward of OHW if necessary for pedestrian access to the shoreline or shoreline structures due to site limitations. Surface area of stairs and landings will count towards maximum overwater coverage limits.</td>
<td>Support Tacoma Power goals.</td>
</tr>
<tr>
<td>Applicable to all stairways and walkways: All stairs and landings shall be the minimum size and footprint required to serve the intended purpose while meeting regulatory requirements.</td>
<td></td>
</tr>
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Plan Update

Example: Stairs Located Over Water

- Stairs initially proposed in-line with dock.
- Unstable slope led to redesign.
- Shortened fixed pier to maintain 300-square-foot limit.
Next Steps

• Gather community input and answer questions
• Make revisions
• Submit to TPU management for review and approval
• Submit to license oversight agencies for review (WDFW, USF&W, USFS, MC, Tribe)
• Update plan
• Submit SMP to FERC
Learn More and Review Documents At:

MyTPU.org/cushmanshoreline
Share Your Thoughts...

1) Fill out a comment form today

2) Send the form later to:
   Tacoma Public Utilities
   Attn: Wynnae Wright, Shoreline and Lands Coordinator
   3628 S. 35th St., Tacoma, WA 98409

3) Send an email to:
   cushmanshoreline@cityoftacoma.org

Please submit your comments by Nov. 1st
Questions?
Thank you!