

Tacoma Power Utilities - Lake Cushman
Proposed Revisions - Shoreline Use Specifications and Permitting Guidelines (SUSPG)
Public Meeting - September 20, 2019

SUSPG Section	Existing SUSPG Language	Proposed SUSPG Language Revision	Alignment with Mason County Shoreline Master Program	Rationale of Proposed Revision
Standard Terms List	<i>Retain existing section language.</i>	<u>Add term and definition: Boat lift: An in-water structure used to berth and launch a single vessel, suspended over the water's surface. A boat lift is generally a manufactured unit without a canopy cover and may be placed in the water or attached to a dock. A boat lift may be designed either for boats, personal watercraft, or floatplanes. A boat lift is to be differentiated from a hoist or crane used for the launching or haul-out of vessels. Boat lifts with canopies are considered covered moorage. Prohibited pursuant to Section 5.</u>	✓	Added definition to provide clarity. Relies on County ordinance definition, and enhances clear communication and usefulness of SMP documents. Relies on Mason County Shoreline Master Program 17.50 definition. Clarify prohibited structures.
Standard Terms List	<i>Retain existing section language.</i>	<u>Add term and definition: Log Boom (private): Log(s) tied and/or anchored at OHW or waterward of OHW. Prohibited pursuant to Section 5.</u>		Added definition to provide clarity. Enhances clear communication and usefulness of SMP documents. Clarify prohibited structures.
Standard Terms List	Retaining wall / Bulkhead. A constructed or installed structure that is employed to restrain a vertical-faced or near-vertical-faced mass of earth. The earth behind the wall may be either the natural embankment or the backfill material placed adjacent to the retaining wall.	<u>Separate terms and add definition: Bulkhead: A retaining wall-like structure constructed at or near OHW to protect a single family residence or lot upon which a single family residence is being constructed and is for protecting land from erosion, not for the purpose of creating land.</u> Retaining Wall: A constructed or installed vertical wall constructed to stabilize slope structure landward of OHW that is employed to restrain a Bulkhead vertical-faced or near-vertical-faced mass of earth. The earth behind the wall may be either the natural embankment or the backfill material placed adjacent to the retaining wall.	✓	Revised definition to provide clarity. Relies on County ordinance definition, and enhances clear communication and usefulness of SMP documents. Clarify permissible uses and permit process.
Standard Terms List	<i>Retain existing section language.</i>	<u>Add term and definition: Construction license: The legal instrument Tacoma Power issues to shoreline lessees and their contractor(s) to permit construction activities on Tacoma Power properties. Construction licenses will not be issued until all regulatory permits are in place. All work allowed under the construction license must be completed and approved by Tacoma Power and the regulatory agencies prior to issuance of a Shoreline Use Permit.</u>	✓	Added definition to provide clarity. Relies on County construction process steps and clarifies that Tacoma Power permit will not be issued until permitted construction and Tacoma Power inspection are complete. Clarify permitting process.
Section 1 Introduction	N/A	<i>Revise language throughout Section 1 to emphasize that accommodating water-dependent uses is the purpose of Tacoma Power's shoreline permitting program.</i>		Support Tacoma Power operational, environmental, recreational, and aesthetic goals. Emphasize Cushman Project's primary purposes and FERC's jurisdiction.
Section 1 Introduction	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; (...)	<u>Add to #1: Future subdivision of eligible lots does not create new eligibility.</u>		Clarifies that only those lots which existed at the time of approval of initial SMP are eligible for SUP's.
Section 2.7 Water Withdrawals from Project Reservoirs	Because state water law governs water rights within the Cushman Project, Tacoma Power has no authority to authorize any withdrawal or consumptive use of the Project waters. Tacoma Power may authorize the construction or placement of structures for the withdrawal of water on Project Lands once a project proponent obtains the necessary rights, authorizations, and permits from the state or applicable local jurisdictions.	<u>Retain existing language and add: Tacoma Power, as land owner, must authorize any water rights application and will generally not allow infringement on its water right, except under exceptional circumstances.</u>		Support Tacoma Power operational and environmental goals. Emphasize Cushman Project's primary purposes and FERC's jurisdiction. Protect Tacoma Power's proprietary and water rights. Support Tacoma Power goals.

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Section 3.4 Campfires	Tacoma Power allows small recreational campfires no more than three feet in diameter within the "A", "B", and Resource Management shoreline classifications. Campfires must not be below the high water line of the lake and must not be under tree canopies. (...)	<i>Move section from Exempt Activities to Permittable Shoreline Uses.</i> Tacoma Power allows <u>will permit</u> small recreational campfires no more than three feet in diameter <u>in approved fire rings</u> within the "A", "B", and Resource Management shoreline classifications. Campfires must not be <u>are prohibited</u> below the high water line of the lake, <u>in hike-in camp areas, and in Resource Management classification.</u> All campfires must comply with any burn bans may be in effect.	✓	Supports Tacoma Power operational, environmental, recreational, and aesthetic goals. Align with State law, U.S. Forest Service guidance, and all regulatory burn bans when in effect.
Section 3.6 Personal Property	Portable furniture such as lawn chairs and portable barbecues may be used on Tacoma Power property but should be removed each day. Tacoma Power also considers picnic tables portable furniture; however it does not require they be removed each day from Tacoma Power property. Users who do not wish to remove these items each day must include them in a Permit so they are not considered abandoned and removed by Tacoma Power staff. Personal property does not include such property as boats, sheds, etc., regulated under Section 4.2.	Portable furniture such as lawn chairs and portable barbecues may be used on Tacoma Power property but should be removed each day. Tacoma Power also considers picnic tables portable furniture; however it does not require they be removed each day from Tacoma Power property. Users who do not wish to remove these items each day must include them in a Permit so they are not considered abandoned and removed by Tacoma Power staff. <u>Permanent fixed benches and picnic tables must be permitted by Tacoma Power.</u> Personal property does not include such property as boats, sheds, etc., regulated under Section 4.2.		Provides clarification of requirements. Supports Tacoma Power operational, environmental, recreational, and aesthetic goals.
Section 4 Permittable Shoreline Uses	<i>Retain existing language.</i>	<u>Add: Only one overwater structure is allowed per eligible lot. For example, a separate swim float is not allowed with a dock.</u>		Supports Tacoma Power operational, environmental, recreational, and aesthetic goals.
Section 4 Permittable Shoreline Uses	Any proposed Non-Project Use of Project Lands that is not an Exempt Activity, as described in Section 3.0 must meet the following criteria set forth below to qualify as an Allowable Use under the SMP policies and therefore, a Permittable Use requiring a Shoreline Use Permit.	Any proposed Non-Project Use of Project Lands that is not an Exempt Activity, as described in Section 3.0 must meet the following criteria set forth below to qualify as an Allowable Use under the SMP policies and therefore, a Permittable Use requiring a Shoreline Use Permit. <u>Any permitted use must comply with all applicable regulatory requirements, including, but not limited to, Mason County Shoreline Master Program, Mason County building code, Washington Administrative Code, and Code of Federal Regulations.</u>	✓	Clarifies all references to specific regulations. Clarify regulatory authorities. Supports Tacoma Power operational, environmental, recreational, and aesthetic goals.
Table 4.1 Allowable Shoreline Structures, Uses, and Activities, and new Section in Appendix B	<i>See Table 4.1</i>	<u>New Section "Lighting" in SUSPG Appendix B: Solar or battery powered lighting is a permittable use. No electrical power sources are allowed. Approved lighting must conform to Mason County Artificial Lighting requirements.</u>	✓	Aligns with County ordinance and supports Tacoma Power operational goals. Align with Mason County Ordinance 17.50.320 (B)1(g) Artificial Lighting.
Section 4.4 Prior Existing Uses	(...) Permitted Prior Existing Uses become subject to the most current permitting criteria established under the SMP when the use: 1. Requires replacement (either voluntary or due to natural disaster). 2. Changes ownership. 3. Undergoes substantive modification (greater than 50 percent of replacement in footprint or value of all 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. 4. Undergoes successive, small modifications that cumulatively exceed 50 percent replacement in footprint or value within a five year period.	(...) Permitted Prior Existing Uses become subject to the most current permitting criteria established under the SMP when the use: 1. Requires replacement (either voluntary or due to natural disaster). 2. Changes ownership 3. Undergoes substantive modification (greater than 50 percent of replacement in footprint or value of all <u>any</u> 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. 4. Undergoes successive, small modifications that cumulatively exceed 50 percent replacement in footprint or value within a five-year period.		In accordance with FERC guidelines, Tacoma Power intends to bring all permitted structures and uses into compliance with SMP requirements; non-conforming uses will be phased out. This differs from Mason County's Ordinance 17.50.320 regarding regulation of existing structures. Support Tacoma Power operational, environmental, recreational, and aesthetic goals. Emphasize Cushman Project's primary purposes and FERC's jurisdiction. 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.

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Section 5 Prohibited Activities	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 5.1 of the SMP and is not listed in this section, it is assumed prohibited unless otherwise confirmed by Tacoma Power. (...)	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. <u>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 "Prior Existing Uses" (...)</u>		Support Tacoma Power operational, environmental, recreational, and aesthetic goals. Emphasize Cushman Project's primary purpose and FERC's jurisdiction.
Section 5 Prohibited Activities	N/A	<u>Add to list of prohibited activities. Jetties, groins, and other shoreline stabilization structures that do not parallel the shoreline.</u>		Added activity to provide clarity. Support Tacoma Power operational, environmental, and recreational goals.
Section 5 Prohibited Activities	N/A	<u>Add to list of prohibited activities. Breakwaters, except when associated with boat-in only lots.</u>		Added activity to provide clarity. Support Tacoma Power operational, environmental, and recreational goals.
Section 5 Prohibited Activities	N/A	<u>Add to list of prohibited activities. Hardscaping, e.g., shotcrete, pavers.</u>		Added activity to provide clarity. Support Tacoma Power environmental and aesthetic goals to encourage native vegetation and natural materials.
Section 5 Prohibited Activities	N/A	<u>Add to list of prohibited activities. Signs/advertisements (commercial, for sale, private property/ no trespassing, etc.) Private log booms</u>		Support Tacoma Power environmental and aesthetic goals. Project lands must be open to the public.
Section 5 Prohibited Activities	N/A	<u>Add to list of prohibited activities. Utilities and satellite dishes</u>		Support Tacoma Power environmental and aesthetic goals. Liability
Section 5 Prohibited Activities	(...) Floating recreational apparatus (e.g. slides, diving platforms, water trampolines, large water toys etc.) (...)	Floating <u>Private</u> recreational apparatus (e.g. slides, diving platforms, water trampolines, large water toys etc.)		Support Tacoma Power environmental and aesthetic goals. Liability Allows for playground equipment in designated parks
Section 5 Prohibited Activities	N/A	<u>Add to list of prohibited activities. Hazardous materials storage, Fuel storage, pesticide use or storage, Vessel maintenance, Vessel repair</u>		Added activity to provide clarity. Support Tacoma Power environmental goals.
Section 5 Prohibited Activities, and Appendix B Section 5 Boat Ramps	N/A	<u>Add to list of prohibited activities. Private Boat ramps. Add to App. B Section 5. Boat ramps associated with single, individual private lots are not permitted.</u>		Support Tacoma Power environmental and aesthetic goals. LCMC provides 4 boat launches for members. Clarifies SMP procedures.
Section 6.1 Standard Procedure for Processing a Shoreline Use Permit.	N/A	<u>The standard procedure will be described in a streamlined flow chart or process diagram.</u>		Format change to enhance clear communication and usefulness of SMP documents. Clarifies SMP procedures.

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Section 6.4 Display of Permit Number	The Permittee will be required to affix an identification plate to all permitted structures that will display the Shoreline Use Permit number so it will be clearly visible from the waterside.	The Permittee Tacoma Power will be required to affix an identification plate to all permitted structures that will display the Shoreline Use Permit identification number so it will be clearly visible from the waterside.		Maintains consistency
Section 6.5 Tacoma Power Processing Fees and Permit Terms	(...) Prior Existing Use Permits cannot be transferred to new owners without the uses complying with current shoreline use requirements. (...)	Prior Existing Use Permits cannot be transferred to new owners without the uses complying with current shoreline use requirements.		Maintains consistency with changes to Section 4.4
Section 7.1.6 Drawings (Application)	<i>Retain existing language.</i>	<u>Add: Location of elevation 742 feet, trees proposed for removal, location of existing and proposed structures, proposed uses and structures located in the 10-foot lateral strip, and extent of proposed ground disturbance.</u>		Enhances clear communication and usefulness of SMP documents. Clarifies SMP procedures 10-foot lateral strip is not subject to SMP, but Tacoma Power must approve permanent structures and fill per lease terms. <i>Include example completed SUP application & drawings in App. C.</i>
Section 7.1.8 Other Requirements (Application)	Most shoreline structures and uses require some level of county, state, and/or federal review and approval. Accordingly, Tacoma Power strongly recommends any Applicant consult with Mason County prior to applying for a Shoreline Use Permit from Tacoma Power. Please indicate on the application form what permits or reviews county, state, and/or federal regulatory agencies require. Applicants do not need to have all permit(s) in hand to apply to Tacoma Power; however, Applicants must submit copies of any required permits or approvals from regulatory agencies to Tacoma Power prior to initiating construction.	Replace existing language. Most shoreline structures and uses require some level of county, state, and/or federal regulatory permits review and approval. (...) Tacoma Power, as landowner, will issue a letter allowing permit applicant to move forward with required regulatory permitting after Tacoma Power approves the SUP application and plans. Permit applicants should not apply for regulatory permits prior to receiving a preliminary approval from Tacoma Power. All required regulatory permits and a Tacoma Power construction or shoreline use permit must be in place prior to beginning any construction or ground disturbances.		Ensures that Tacoma Power maintains control of activities on Project lands and that proposed project conform to SMP. Emphasizes Cushman Project's primary purposes and FERC's jurisdiction. Clarifies SMP procedures.
Appendix B Section 1.0 Requirements Applicable to All Permittable Uses	<i>Retain existing language.</i>	<u>Add: All applicants will be required to remove and dispose of debris and abandoned structures and building materials located on Tacoma Power's property waterward of 742 feet elevation and on the lakebed fronting the development as a condition of their construction permit.</u>		Support Tacoma Power environmental and aesthetic goals.
Appendix B Section 1.0 Requirements Applicable to All Permittable Uses	<i>Retain existing language.</i>	<u>Add: All permitted uses should be designed and constructed to withstand wind and wave conditions under normal full pool elevation of 738 feet. The FERC license for the Cushman Project identifies elevations to 742 feet as potentially affected by Project operations.</u>		Support Tacoma Power operational goals. Emphasize Cushman Project's primary purposes and FERC's jurisdiction. Ensures new construction can withstand reservoir fluctuations, storms and wakes.
Appendix B Section 2.1 Placement, Location, and Length (Private/Single Family Docks)	(...) Docks must be placed as close to the shoreline as possible and may not extend more than 50 feet waterward from the OHW line of the reservoir. The 50 feet includes any gangway or ramp to access a floating dock. Extensions into a cove are limited to 50 feet or one-third the distance across a cove, whichever is less and providing that the dock would not create a hazard to safe navigation.	(...) Docks must be placed as close to the shoreline as possible and may not extend more than 50 feet waterward from the OHW line of the reservoir. The 50 feet includes any gangway or ramp to access a floating dock. Extensions into a cove are limited to 50 feet or one-third the distance across a cove, whichever is less and providing that the dock would not create a hazard to safe navigation. Docks and unattached floats permitted in coves must conform to Mason County Docks & Unattached Floats requirements.	✓	Conforms to County ordinance, which supports Tacoma Power operational and environmental goals. Align with Mason County Ordinance 17.50.320 (B)2(e) Docks & Unattached Floats.

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Appendix B Section 2.2 Design (Private/Single Family Docks)	Tacoma Power encourages floating docks and discourages piers (docks built on pilings). A floating dock is a dock supported by floatation rather than permanent supports. Floating docks can more easily respond to changes in the reservoir water levels and do not require soil disturbance. If a proposed dock involves installation of pilings or other ground disturbance, Tacoma Power will require a cultural resource survey in most cases. (...)	Tacoma Power encourages floating docks and discourages piers (docks built on pilings). A floating dock is a dock supported by floatation rather than permanent supports. Floating docks can more easily respond to changes in the reservoir water levels and do not require soil disturbance. If a proposed dock involves installation of pilings or other ground disturbance, Tacoma Power will require a cultural resources survey in most cases.(...)	✓	Conforms to County ordinance and supports Tacoma Power operational goals. Align with Mason County Ordinance 17.50.320 (B)2(f)(v)(a) Freshwater Dock. Aligns with Tacoma Power's License requirements related to Cultural Resources.
Appendix B Section 2.2 Design (Private/Single Family Docks) and Standard Term List	Tacoma Power prohibits the following design features and uses: (...) Skirting around docks.	<u>Add: 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.</u> <u>Add term and definition: Skirting: "solid barrier built around in-water structures which prevent the natural flow of water and wildlife".</u> <u>Add to prohibited design features- exposed rebar, new concrete float rests, exposed styro, tires used as bumpers or floats.</u>	✓	Conforms to County ordinance and supports Tacoma Power operational and environmental goals. Align with Mason County Ordinance 17.50.320 (B)1(j) and (B)2(f)(ii) Repair and Replacement, and Docks and Unattached Floats. Addresses common design issues.
Appendix B Section 2.2 Design (Private/Single Family Docks)	(...) Docks must extend at least 12 inches above the water surface at all times, but no more than 5 feet at full reservoir elevation. (...)	Docks must extend at least 12 inches above the water surface at all times, but no more than 5 feet at full reservoir elevation. (...) <u>Docks must conform to Mason County code for Freshwater Docks and Floats. (...)</u>	✓	Align with Mason County Ordinance 17.50.320 (B)2(f)(viii)(e) Floats. Support Tacoma Power goals.
Appendix B Section 2.3 Materials and Construction Methods (not including 2.3.1) (Private/Single Family Docks)	All materials will be of good quality and suitable for the intended purpose... [through the end of Section 2.3].	<u>Replace first two paragraphs with: Materials used for construction must conform to regulatory agency requirements related to treated wood and toxic materials.</u> <u>Retain last paragraph: All work to construct or install permitted docks must be conducted in such a manner that limits erosion or siltation of adjacent areas. Removal of shoreline and aquatic vegetation must be limited to that necessary to gain access to construct the shoreline use. In general, Tacoma Power will not allow tree removal to build a dock. Permit Applicants must clearly identify in their Permit applications what shoreline vegetation they intend to remove to access the site.</u>	✓	Conforms to County ordinance and supports Tacoma Power environmental goals. Eliminates repetition of vegetation permitting requirements presented elsewhere in the SMP and SUSPG. Align with Mason County Ordinance 17.50.320 (B)1(d)(vi) Treated Wood and Toxic Materials.
Appendix B Section 2.3.1 Flotation (Private/Single Family Docks)	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. Tacoma Power will also consider other non-foam floatation systems but does not allow metal covered or injected drum flotation for docks.	<u>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. Tacoma Power will also consider other non-foam floatation systems but does not allow metal covered or injected drum flotation 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.</u>	✓	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.

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Appendix B Section 2.4 Appurtenant Dock Uses	Appurtenant Dock Uses: Canoes, kayaks, and portable boats can be stored on existing docks without grated decking or on the adjacent upland if storage does not damage vegetation. Tacoma Power allows only one portable boat, canoe, or kayak per adjacent lot without additional permitting to avoid unattractive and damaging impacts to the shoreline vegetation. Larger boats cannot be stored on the upland part of Tacoma Power property. A small portable storage container not more than four feet high may be placed on the dock. Dock design may include benches. Portable furniture may be placed on the dock, but must be secured so it does not blow into the reservoir. No toilet, sink, shower, or any other device for waste disposal may be located on the structure.	Appurtenant Dock-Uses: Canoes, kayaks, and portable boats can be stored on existing docks without grated decking or on the adjacent upland if storage does not damage or prevent establishment of vegetation. Tacoma Power allows only one portable boat, canoe, or kayak per adjacent lot without additional permitting to avoid unattractive and damaging impacts to the shoreline vegetation. Larger boats cannot be stored on the upland part of Tacoma Power property. A small portable storage container not more than four feet high may be placed on the dock on the adjacent upland if it does not damage vegetation. Dock design may include benches. Portable furniture may be placed on the dock, but must be secured so it does not blow into the reservoir. No toilet, sink, shower, or any other device for waste disposal may be located on the structure or the adjacent upland.	✓	Conforms to County ordinance and supports Tacoma Power operational and recreational goals. Align with Mason County Ordinance 17.50.120 Definitions - Appurtenance. Support Tacoma Power goals.
Appendix B, Section 3 Community and Commercial Docks	(...) • By mutual, recorded agreement, two or more adjacent property owners (who are not incorporated into an existing subdivision) can be considered a Community dock and may share one dock placed adjacent to, or straddling their shared property line as it extends across the Project Boundary and into the reservoir. No other dock will be permitted within the boundaries of the properties sharing the community dock. Applicants for a community dock Permit must execute a written agreement granting reciprocal use of the Community dock. • Docks are to be placed as close to the shoreline as possible. There is no maximum length for Community or Commercial docks; however, the Applicant must show the size proposed is the minimum necessary to accommodate anticipated uses. Extensions into a cove or the reservoir are limited to the following, whichever is less: o one- third the distance across the cove; o the minimum distance that would not create a hazard to safe navigation; or o the minimum distance that allows the property owner sufficient water depth for watercraft during normal summer reservoir elevations.	(...) • By mutual, recorded agreement, two or more adjacent property owners (who are not incorporated into an existing subdivision) can be considered a Community dock and may share one dock placed adjacent to, or straddling their shared property line as it extends across the Project Boundary and into the reservoir. No other dock will be permitted within the boundaries of the properties sharing the community dock. Applicants for a community dock Permit must execute a written agreement granting reciprocal use of the Community dock. • Docks are to be placed as close to the shoreline as possible. There is no maximum length for Community or Commercial docks; however, the Applicant must show the size proposed is the minimum necessary to accommodate anticipated uses. Extensions into a cove or the reservoir are limited to the following, whichever is less: o one- third the distance across the cove; o the minimum distance that would not create a hazard to safe navigation; or o the minimum distance that allows the property owner sufficient water depth for watercraft during normal summer reservoir elevations.	✓	Conforms to County ordinance and supports Tacoma Power operational and recreational goals. Align with Mason County Ordinance.
Appendix B Section 4.0 Shoreline Stabilization Measures (including 4.1)	Entire sections: Shoreline Stabilization Measures (Section 4.0), and Repair and Replacement of Existing Shoreline Stabilization Structures (Section 4.1).	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).

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Appendix B Section 5.1 Placement and Location (Boat Ramps)	No more than one ramp may be established for each associated Community or Public facility. Tacoma Power may permit boat ramps where the upland slope within 25 feet of the OHW line does not exceed 25 percent and where substantial cutting, grading, filling, or bank protection is not necessary. All ramps must be located between the adjacent property's side lot lines to provide at least a 40-foot offset from the adjacent property side lot line, if extended onto the shoreline. Alternatively, placement between the 40-foot off-set line and the extended lot line may be allowed with written permission from the adjacent property owner(s) and if, in the opinion of Tacoma Power, the construction/placement will not create conflicts with adjacent property owners or create a hazard to safe navigation. If the location of side property lines cannot be established without a survey, Tacoma Power may require the Applicant to provide a survey by a registered land surveyor before a Permit is issued.	No more than one ramp may be established for each associated Community or Public facility. Tacoma Power may permit boat ramps where the upland slope within 25 feet of the OHW line does not exceed 25 percent and where substantial cutting, grading, filling, or bank protection is not necessary. All ramps must be located between the adjacent property's side lot lines to provide at least a 40-foot offset from the adjacent property side lot line, if extended onto the shoreline. Alternatively, placement between the 40-foot off-set line and the extended lot line may be allowed with written permission from the adjacent property owner(s) and if, in the opinion of Tacoma Power, the construction/placement will not create conflicts with adjacent property owners or create a hazard to safe navigation. If the location of side property lines cannot be established without a survey, Tacoma Power may require the Applicant to provide a survey by a registered land surveyor before a Permit is issued. <u>All ramps must be located between the adjacent property's side lot lines so as to not create conflicts with adjacent property lessees or create a hazard to safe navigation.</u>	✓	Enhances clear communication and usefulness of SMP documents. Clarifies SMP intent and simplifies procedures.
Appendix B Section 5.2 Design (Boat Ramps)	Boat ramps must be designed to meet applicable Mason County requirements. Boat ramps must be designed to be in character and scale with the surrounding shoreline.	Boat ramps must be designed to meet applicable Mason County requirements. Boat ramps must be designed to be in character and scale with the surrounding shoreline.	✓	Enhances clear communication and usefulness of SMP documents. Clarifies SMP intent.
Appendix B Section 5.3 Materials and Construction (Boat Ramps)	Asphalt or other petroleum-based surfaces are not allowed. Ramp surfaces must consist of: • Gravel or clean stone. • Pre-cast concrete planks, panels, or slabs. • Cast in place concrete. Gravel or stone ramps must be designed to prevent the materials from eroding into the reservoir. Ramps containing concrete must be sufficiently cured to prevent leaching prior to contact with water. Bituminous pavement is not allowed as a ramp surface. In general, boat ramp construction must occur in the winter months when the lake is low. However, Tacoma Power cannot guarantee or predict specific lake elevations.	Asphalt or other petroleum-based surfaces are not allowed. Ramp surfaces must consist of: • Gravel or clean stone. • Pre-cast concrete planks, panels, or slabs. • Cast in place concrete. Gravel or stone ramps must be designed to prevent the materials from eroding into the reservoir. Ramps containing concrete must be sufficiently cured to prevent leaching prior to contact with water. Bituminous pavement is not allowed as a ramp surface. In general, boat ramp construction must occur in the winter months when the lake is low. However, Tacoma Power cannot guarantee or predict specific lake elevations.	✓	Enhances clear communication and usefulness of SMP documents. Clarifies SMP intent.
Appendix B Section 6 Private Mooring Buoys	(...) 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; 3. 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. (...)	(...) 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; <u>2. When associated with a Public or Community recreation site.</u> Tacoma Power will review Permit applications on a case by case to determine if they qualify for a buoy. (...) <u>Add: To accommodate boat mooring during low reservoir levels, Tacoma Power will allow one "mooring buoy alternative" 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.</u>		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. Support Tacoma Power goals.
Appendix B Section 7 Floating Booms	<i>Retain existing language.</i>	<u>Add: Floating booms may also be permitted when associated with boat-in only lots.</u>		Enhances clear communication and usefulness of SMP documents. Clarifies SMP intent.

SUSPG Section	Existing SUSPG Language	Proposed SUSPG Language Revision	Alignment with Mason County Shoreline Master Program	Rationale of Proposed Revision
Appendix B Section 9.0 Paths	(...) The path should be the minimum width necessary to accommodate shoreline access and shall not exceed 5 feet in width in the A and B Classifications and shall not exceed 3 feet in width in the Resource Management Classification.(...) Path surfaces should consist of natural materials such as grass, wood chips, or gravel/crushed rock and placement of such must not involve earth moving or soil disturbance. (...)	The path should be the minimum width necessary to accommodate shoreline access and shall not exceed 5 feet in width in the A and B Classifications and shall not exceed 3 feet in width in the Resource Management Classification. <u>The path should be the minimum width necessary to accommodate shoreline access. In the A and B Classifications width shall not exceed Mason County Ordinance width requirements. Width shall not exceed 3 feet in the Resource Management Classification.</u> Path surfaces should consist of natural materials such as grass, wood chips, or gravel/crushed rock and placement of such must not involve earth moving or soil disturbance.	✓	Width in A and B Classifications revised to reflect Mason County Ordinance requirement. Align with Mason County Ordinance 8.52.170 (D)4(j) Trails, Single residential. Grass is a prohibited use per Section 5 of the SUSPG.
Appendix B Section 10 Stairways and Walkways	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. Installation of new steps or maintenance of existing steps must also meet Mason County building standards.	<u>Stairways and walkways located landward of OHW:</u> 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. <u>Stairways and walkways located waterward of OHW:</u> Tacoma Power may permit stairs and landings waterward of OHW if <u>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. 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.</u>	✓	Recognizes challenges of steep terrain in some locations, while conforming to County ordinance and supporting Tacoma Power aesthetic and public use goals. Align with Mason County Ordinance 8.52.170 (E)4(k) Stairs, Upland. Support Tacoma Power goals.

SUSPG Section	Existing SUSPG Language	Proposed SUSPG Language Revision	Alignment with Mason County Shoreline Master Program	Rationale of Proposed Revision
Appendix B, Section 11.0 (including all subsections) Vegetation Management	Tacoma Power's goal is to have a healthy, vegetated buffer along most of the margins of the reservoirs. A natural vegetated buffer offers erosion control, provides fish and wildlife habitat, reduces noise, moderates temperature, helps filter runoff and pollution, and offers scenic beauty and privacy. Property owners and lessees near the reservoirs may wish to improve views and open areas for recreation. Others may wish to plant new vegetation or landscape the shoreline areas adjacent to their properties. It is important to note that a Tacoma Power-issued Permit for shoreline structures does not authorize shoreline vegetation modification unless it is stated in the Permit specifically. Removal of naturally occurring vegetation must be minimal if allowed at all. Tacoma Power will encourage development of landscape plans that favor wildlife habitat. While some activities may be exempt from permitting, Tacoma Power requires that anyone planning to clear, remove, or mow vegetation or to plant or landscape with vegetation or other materials along the shorelines within the Project Boundary consult with Tacoma Power staff, as such actions may require a Permit. Special circumstances, such as the presence of wetlands, may result in a requirement for mitigation or alternative vegetation management practices. Tacoma Power will only permit removal of vegetation within the Resource Management Classification if a resource agency or Project-related management plan prescribes the practice or as described below. Anyone considering removal of trees or other vegetation within 200 feet of shorelines should be aware that other local, state, and federal regulatory approval might also be required.	Tacoma Power's goal is to have a healthy, vegetated buffer along most of the margins of the reservoirs <u>to support water quality, wildlife habitat, and aesthetics. To that end, .</u> A natural vegetated buffer offers erosion control, provides fish and wildlife habitat, reduces noise, moderates temperature, helps filter runoff and pollution, and offers scenic beauty and privacy. Property owners and lessees near the reservoirs may wish to improve views and open areas for recreation. Others may wish to plant new vegetation or landscape the shoreline areas adjacent to their properties. It is important to note that a removal of naturally occurring vegetation must be minimal if allowed at all <u>and must be in conformance with Mason County code.</u> Tacoma Power-issued Permit for shoreline structures does not authorize shoreline vegetation modification unless it is stated in the Permit specifically. <u>A Cultural Resources Survey will be required prior to any ground disturbance.</u> Tacoma Power will encourage development of landscape plans that favor wildlife habitat. While some activities may be exempt from permitting, Tacoma Power requires that anyone planning to clear, remove, or mow vegetation or to plant or landscape with vegetation or other materials along the shorelines within the Project Boundary consult with Tacoma Power staff, as such actions may require a Permit. Special circumstances, such as the presence of wetlands, may result in a requirement for mitigation or alternative vegetation management practices. Tacoma Power will only permit removal of vegetation within the Resource Management Classification if a resource agency or Project-related management plan prescribes the practice or as described below. Anyone considering removal of trees or other vegetation within 200 feet of shorelines should be aware that other local, state, and federal regulatory approval might also be required.	✓	Conforms to County ordinance and supports Tacoma Power operational, environmental, and aesthetic goals. Align with Mason County Ordinance 17.50.145 Policies, Views and Aesthetics. Aligns with Tacoma Power's License requirements related to Cultural Resources.
Appendix D Fee Schedule	STRUCTURAL BULKHEAD: \$750 application fee / \$100 annual fee NON-STRUCTURAL BULKHEAD: \$300 application fee / \$50 annual fee	STRUCTURAL BULKHEAD: \$750 application fee / \$400 annual fee NON-STRUCTURAL BULKHEAD: \$300 application fee / \$50 annual fee		Not feasible for Tacoma Power to bill on an annual basis. Application fee will be due at time of application. Note: Tacoma Power is not currently charging re-application fees while we work toward bringing all shoreline uses and structures under permit.