

Public Comment Summary: City of Lakewood Locally Approved SMP Periodic Review

Ecology Public Comment Period, June 17 – July 18, 2019

Prepared by Michelle McConnell, WA Dept. of Ecology, July 30, 2019

City of Lakewood Response to Comments submitted to ECY, July 31, 2019

No comment submittals were received during the Ecology Public Comment Period; one (1) comment letter was received after the comment period closed. The issues raised in those comments are summarized below, organized by topic or pertinent SMP chapter/section.

Row	SMP SECTION/ COMMENT TOPIC	COMMENTER	COMMENT SUMMARY*	CITY OF LAKEWOOD RESPONSE & RATIONALE
COMMENT LETTERS RECEIVED 6/17/19 – 7/18/19				
-	-	<i>None</i>	-	-
COMMENTS RECEIVED AFTER 7/18/19				
1.	General	K. Reidinger	<p>Interest is focused on Clover Creek (including adjacent Springbrook Neighborhood), Chambers Creek, and Steilacoom Lake as critical habitat for ESA-listed Puget Sound steelhead. Lakewood SMP falls short of the SMA and needs more revision & upgrade than a periodic review to ensure consistency with the NOAA Fisheries steelhead recovery plan.</p> <p>Pending/future changes to local land use zoning may affect the SMP and impact streams/riparian zones, including impervious surface areas, stormwater pollution, reduced biological integrity, and other urbanization effects. Stormwater pollution is one cause for the near extinction of the Puget Sound Coho. The Open Space designation is the best option to protect Clover Creek shorelines.</p> <p>The area was historically very biologically productive, but since the 1930s the landscape and surface waters were greatly altered, impacting wetlands, flooding, stream channelization and species such as Sandhill cranes and Puget balsamroot. Therefore, careful land use planning efforts should protect what little remains.</p>	<p>Comments noted.</p> <p>The periodic review process conducted in 2019 addresses changes in requirements of the act and guidelines requirements since the comprehensive update or the last periodic review, and changes for consistency with revised comprehensive plans and regulations, together with any changes deemed necessary to reflect changed circumstances, new information or improved data. There is no minimum requirement to comprehensively revise shoreline inventory and characterization reports or restoration plans in a periodic review.</p> <p>Lakewood will complete the next periodic review of its SMP in 2027, in accordance with RCW 90.58.080 (4)(b)(i). Should direction from the City Council and funding provide, the City may also conduct a locally initiated SMP amendment cycle per WAC 173-26-110 to address a change in local shoreline conditions, the comprehensive plan or zoning, or improved data.</p> <p>When Lakewood reviews potential zoning and land use amendments through its Comprehensive Plan amendment cycle or site-specific rezone process, it considers environmental impacts via SEPA and via the RCW and</p>

*See original comment submittal for complete verbiage.

				WAC-required analysis for such zoning reviews.
2.	Shoreline Analysis Report	K. Reidinger	<p>The City acknowledged & incorporated previous comments and images provided earlier in the periodic review process, but the shoreline report does not provide an accurate foundation for restoration efforts.</p> <p>This report is out of date and does not satisfy the SMA requirements for shoreline inventory & characterization. Inadequacies include: consultant’s lack of field investigations, detailed assessments of riparian zone native/invasive vegetation, LWD, and stream, wetland and shoreline conditions.</p> <p>The City should follow published protocols to conduct stream assessments & collect new data to prepare a revised report with actual field observations.</p>	<p>Comments noted.</p> <p>The action taken by the City of Lakewood via Ordinance 711, adopted May 6, 2019, is in accordance with Chapter WAC 173-26; it is an SMP periodic review rather than the comprehensive review required per RCW 90.58.080 (which Lakewood completed in 2014.) The periodic review process addresses changes in requirements of the act and guidelines requirements since the comprehensive update or the last periodic review, and changes for consistency with revised comprehensive plans and regulations, together with any changes deemed necessary to reflect changed circumstances, new information or improved data. There is no minimum requirement to comprehensively revise shoreline inventory and characterization reports or restoration plans in a periodic review.</p> <p>Lakewood will complete the next periodic review of its SMP in 2027, in accordance with RCW 90.58.080 (4)(b)(i). Should direction from the City Council and funding provide, the City may also conduct a locally initiated SMP amendment cycle per WAC 173-26-110 to address a change in local shoreline conditions, the comprehensive plan or zoning, or improved data.</p>
3.	Shoreline Restoration Plan	K. Reidinger	This plan is not based on actual field observations/data, therefore it is inadequate to satisfy SMA’s intent for restoration.	<p>Comment noted.</p> <p>There is no minimum requirement to comprehensively revise shoreline inventory and characterization reports or restoration plans in a periodic review.</p>
4.	SMP 4.C Shoreline Use & Development Standards	K. Reidinger	The Table II Shoreline Development Standards setbacks and buffers are vague and confusing, and inconsistent between waterbodies; enhancement is not explained.	Comment noted.

*See original comment submittal for complete verbiage.