

From: [Mike Jacobs](#)
To: [City Council](#); [Shari Winstead](#); [Chris Eggen](#); [Keith McGlashan](#); [Will Hall](#); [Doris McConnell](#); [Jesse Salomon](#); [Chris Roberts](#); [Debbie Tarry](#); [Jan Sievers](#)
Cc: asktheboard@innisarden.org; [City Council](#); ismith@shorelinewa.gov
Subject: Fw: Letter from Michael L. Jacobs, President of the Innis Arden Club
Date: Thursday, August 07, 2014 6:31:31 PM
Attachments: [doc20140807182531.pdf](#)

----- Original Message -----

From: [Rustina Guthrie](#)

To: mikejacobslaw@comcast.net

Sent: Thursday, August 07, 2014 6:19 PM

Subject: Letter from Michael L. Jacobs, President of the Innis Arden Club



President
Michael L. Jacobs
Vice-President
David Fosmire
Board of Directors
Robert Allen
Brian Branagan
Suzanne Cox
John Hollinrake
Steve Johnston
Rick Leary
Elizabeth Yurezyk

Via Email
council@shorelinewa.gov
jsmith@shorelinewa.gov
August 7, 2014

Shoreline City Council
City of Shoreline
17500 Midvale Avenue N.
Shoreline, WA 98133

Re: Proposed SMC 20.50.____ Vegetation Management Plan Code Amendment
Submitted by The Innis Arden Club, Inc.

Dear Council Members:

Council will be voting on August 11, 2014 regarding the Seattle Golf Club's request for an exemption from the Shoreline Municipal Code for certain vegetation management related activities. Our understanding is that the Planning Commission is not in favor of this exemption. The Innis Arden Club recently provided Council members with a proposed code amendment entitled "Vegetation Management Plans" ("VMP"). The Club encourages the City to take up this issue at this time as this would greatly benefit both the City and large tract holders such as the Seattle Golf Club. Other jurisdictions such as Bellevue have authorized VMPs on private property including critical area buffers and geological hazard critical areas. See City of Bellevue Land Use Code § 20.25H.055.C.3.

Attached is Question and Answer format explaining the advantages of a VMP Code Amendment. VMPs do not avoid regulation, but allow tract owners to plan stewardship activities in cooperation with the City rather than submitting piecemeal permit applications which are expensive and time consuming for both the City and the applicant.

Shoreline City Council
City of Shoreline
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Thank you for your consideration of this important issue.

Sincerely,



Michael L. Jacobs
President - The Innis Arden Club, Inc.

MLJ: rg

Enclosure.

cc: The Board
Mayor Shari Winstead (swinstead@shoreline.wa.gov);
Deputy Mayor Chris Eggen (ceggen@shorelinewa.gov);
Mr. Keith McGlashan (kmcglashan@shorelinewa.gov);
Mr. Will Hall (whall@shorelinewa.gov);
Ms. Doris McConnell (dmccconnell@shorelinewa.gov);
Mr. Jesse Salomon (jsalomon@shorelinewa.gov);
Mr. Chris Roberts (croberts@shorelinewa.gov);
City Manager Debbie Tarry (dtarry@shorelinewa.gov);
City Attorney Ian Sievers (isievers@shorelinewa.gov);

VEGETATION MANAGEMENT PLAN QUICK Q and A:

Q: What is a Vegetation Management Plan?

A: A VMP is a holistic planning tool to regulate tracts with recurring vegetation and stewardship issues.

Q: So a VMP gives an exemption from Tree Code or Critical Area Code requirements?

A: There is no exemption: compliance with Code, as determined by the Planning Director, is built into the Plan.

Q: Then why bother with a VMP, how is it different than current permitting?

A: VMPs are useful for the same reasons that a City adopts a Comprehensive Plan and a Zoning Map rather than making decisions on a lot by lot basis. A VMP saves time and expense for the City and the property owner by eliminating piecemeal permitting while ensuring comprehensive review.

Q: The Seattle Golf Club did not request a VMP Code Amendment, it asked for a complete Code exemption for certain activities. Why not just adopt the Golf Club exemption?

A: The City plans for and regulates land uses and activities -- and their impacts. Exemptions must be based on the uses and activities themselves, not on who does them. A framework in the Code authorizing VMPs will in the end give the Golf Club what it needs without granting a special interest exemption.

Q: Why is Innis Arden pushing for the City Council to have the Planning Commission explore VMPs? Isn't Innis Arden just trying to avoid regulation by using VMPs?

A: VMPs do not avoid regulation. The Code's goals and requirements must still be met. But a VMP allows tract owners to plan stewardship activities in cooperation with the City rather than lurch from application to application on a piecemeal basis. That is important to Innis Arden which owns 50 acres of Open Space Reserve Tracts and many

thousands of trees. It should be important to the City too because of the redundant staff time involved in processing applications on a piecemeal basis.

Q: Where is the City going to find the time to look at a VMP framework Code amendment?

A: The Planning Commission indicated interest in the VMP planning concept and apparently would have the time to explore it within the coming months. Because the concept is established elsewhere, there are useful models already available to evaluate for City of Shoreline use.

Q: Won't VMPs require more work and expense for staff down the road?

A: The work involved in reviewing a proposed VMP once a Code framework is in place will be important, but not overwhelming. Instead of scrutinizing (including using experts) one piece of a puzzle, staff will be looking at the entire picture for a particular VMP site. That may take a bit more time upfront, but the payoff will be in reduced staff time because of the elimination of piecemeal applications down the road. The difference is that, under the current system, tract owners as well as staff must again and again and again devote time and expertise to successive, one shot permit applications.

Q: Why should Council deal with this now?

A: Last year, the Seattle Golf Club made its exemption request, which it repeated this year. The SGC request highlighted the need to at least consider the VMP concept as a substitute for the current, piecemeal approach to management of tracts, which is expensive, frustrating, and inefficient for owners and City staff alike. Recognizing this, the Shoreline City Council itself adopted an "Urban Forest Strategies Plan" earlier this summer that expressly includes – as a near-term priority --working with private property owners on legislation authorizing large tract VMPs. In light of this, the question to ask is "If not now, when ?"

Q: How would a VMP program work?

A: To start the discussion, Innis Arden has proposed a VMP framework that would give the Planning Director authority to approve a ten-year VMP prepared by a City-recognized “qualified professional”. The Plan would include mandatory components and would have to meet criteria consistent with the current Code. The City would be authorized to make compliance checks on sites subject to a VMP. In addition, the Code would require annual reports to the Department on actions taken under a VMP. The result would be a better process with over-all efficiencies and economies -- meanwhile maintaining the Department’s over-all control.

Q: Do other jurisdictions have VMP Code provisions?

A: Yes. Bellevue, for example, authorizes critical area vegetation management plans on private property, in critical area buffers or geological hazard critical areas without regard to tract size. See BMC 20.25H.055.C.3.i (vi).