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Margaret Glowacki  
City of Seattle – DPD  
700 Fifth Ave. Suite 2000  
P.O. Box 34019  
Seattle, WA 98124-4019

Dear Ms. Glowacki,

Thank you for providing the opportunity to respond to the revised draft of the City of Seattle Shoreline Master Program Update regulations through December 23rd. This update is a remarkable and vitally important process, and I appreciate the many hours and goodwill you and your staff have put into making it responsive to public input yet ever more protective of the shoreline environment.

I am writing to urge you to retain the revised draft language in Section 23.60.190 Standards for vegetation and impervious surface management, specifically in Parts A, B, F, G, and H.

In my response to the first SMP draft I focused on language specific to Section 23.60.190, Part B.2. Noxious weed removal. Since then I have read the revised draft more closely and realize that I also fully support Parts A, F, G, and H. I should not have neglected to mention my support for Part A, Application and plans, in my first letter for it is central to the development of responsible integrated aquatic vegetation management plans. I also believe that the more specific language and substantial reorganization of the proposed regulations in Sections F, G and H related to mitigation, vegetation monitoring, and application of pesticides and fertilizers in the Shoreline District have strengthened the entire set of vegetation management regulations.

From my perspective the most effective and encouraging of these regulations include

- requiring submission to the City of applications and plans for removal of aquatic, and all other, vegetation from the Shoreline District, rather than to the State Department of Ecology,
- the City's attention to best management practices and implementation of integrated pest management principles that prioritize manual and mechanical aquatic weed control methods over the use of herbicides,
- review of required aquatic weed control applications and plans by a staff planner/fish biologist and the implied resulting conversations with applicants that promote engagement in the process, informed decision making, and public education regarding non-toxic alternatives to herbicides,

- City management of vegetation removal and coordination with DOE in development of an EIS and mitigation plan if herbicides must be used.

I believe that these regulations and others related to vegetation management are congruent with the City's existing regulations and practices to protect water quality, habitat, and fish populations. These include the City's Critical Areas Ordinance, Seattle Parks Department's policies regarding weed control, and the landmark Shoreline Management Act of 1971, which prohibited the use of herbicides to control aquatic noxious weeds altogether - a position the City maintained for 26 years.

It would be a most welcome outcome if adoption and implementation of these regulations gradually reduce the number and amount of liquid and granular aquatic herbicides being applied to local waters and further protect our precious shoreline resources.

Best wishes, and many thanks,

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