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Sent: Friday, June 03, 2011 3:35 PM
To: zSMP
Cc: Farber, Daniel (PARKS); Gustafson, Derek (PARKS); Fields, Nikki (PARKS); Herzog, Peter (PARKS)
Subject: SMP Draft Consistency Review document comments
Attachments: Clallam County consistency review comments.doc

Attached for your consideration are Washington State Parks' comments to the Clallam County SMP Update Consistency Review draft document. We found this to be very useful, providing a good overview of important tasks to come. We appreciate being able to provide information at this early stage, and look forward to being a long term partner in providing shoreline-based water access and recreation experiences for visitors from throughout the area.

I am the initial contact point for State Parks. Depending on conditions still in flux, it is possible that a staff person from our NW regional office in Burlington could assume lead at some time during the process. We will make sure that a smooth handoff takes place, if that should occur. In the meantime, let me know if I can answer any questions or concerns.

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Washington State Parks comments to the
Draft Clallam County Shoreline Master Program Update Consistency Review
June 3, 2011

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Public access is typically discussed as a requirement placed on facilities that would otherwise not provide it. Public access should also be discussed as one of the primary goals of the SMA, which is significantly met through areas dedicated to access, such as state and local parks. These are areas where the public gets the best chance to enjoy the water's edge, and participate in activities such as swimming, wading, gathering shellfish, fishing, and walking on the beach.

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State Parks does not manage timber for harvest *per se*. However, at times we do perform significant timber management practices for improvement of overall forest health, and to remove trees that pose a danger to public use. Strict guidelines are followed in developing work plans, and state forest practice regulations are always followed. Please consider whether this type of forest management is properly addressed.

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We support the concept of acknowledging a difference between public and private launch facilities. Current good design standards allow a single public launch lane to support about 30 car/trailer parking spaces. This means a single public launch lane can avoid the impacts of up to 30 private launches. A double lane is twice as effective. When considering the beach impacts of a public launch, the exponential reduction in the need for individual units should enter into the No Net Loss discussion. Also, please consider that most public launches absolutely require a set of handling floats parallel to the launch to allow for safe launch and retrieval of multiple vessels in all conditions.

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The tangle of definition discussions seems more confusing than necessary. "Dock" is a common, but often misused, term for nearly anything on the water. Check your dictionary, and find that it typically refers to commercial berths for loading or unloading cargo. In the far more common access facilities, State Parks does well with two clearly defined terms:

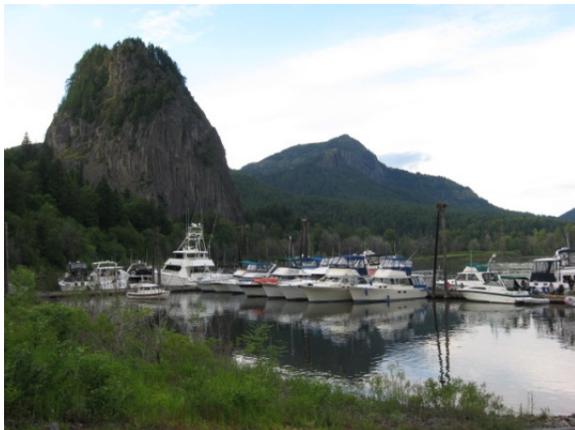
Piers are fixed structures supported on piles, typically attached to the shore.

Floats float.

Piers may be used alone on water bodies with a very consistent water elevation. Floats are used where water levels vary, as on tidal salt water or reservoirs with seasonal variations.

There are different types of floats, determined by use. Many floats are accessible from shore, with a typical pier leading to a float or string of floats, connected by a gangway. Handling floats support safe boat launch use; moorage floats provide solid tie-up for overnight boaters; fishing and other recreational floats are configured as needed to support over-water recreation. Some floats, such as swim area floats or water ski floats, are anchored off shore and reachable only from the water.

Piers and floats for private and public use are significantly different. While a private pier is likely primarily for access to a moderate size moored boat, public moorage facilities have to accommodate a wide variety of craft. In addition, both boaters and those accessing from land use public floats for a variety of activities. Typical of many public facilities, public piers and floats need to be substantially larger and more robust than private facilities. While this inevitably increases some impacts, such as shading, they can be minimized through good design, such as using light-transmitting grid materials



where appropriate. In addition, it should be recognized that a single public facility serves a large population, while private facilities serve only a few, and the cumulative effect of multiple private facilities is typically orders of magnitude larger than that of shared public installations.

This illustration shows the type of transient use common on public park moorage facilities.

State Parks has found that a 12-foot wide float unit works well supporting public recreational moorage and the related uses that go along with it. Our current standard design incorporates open grid work in the center areas not taken up by floatation units, allowing significant light penetration.

Moorage buoys should be encouraged. A single properly placed moorage buoy that serves a succession of boaters (often several at a time, depending on vessel length) prevents widespread bottom damage done by individual anchors. If the discussion encourages minimal bottom impacts, be sure to allow for anchor alternatives. Although helical anchors are excellent where they work, they can't be placed on certain substrates, and old fashioned weights are still needed at times.

State Parks' archaeological staff is mystified by the requirement to notify our director if certain features are discovered. We recommend deletion of the State Parks reference as the appropriate DAHP and tribal references are added. Also, since work is often done by agents who are not the land owner, the land owner should always be notified.

We're confused by the confusion over the "recreation" definitions. That the SMP definition of "recreation" and the state definition of "recreational development" differ should be no surprise. They are different things. Recreation is an activity or experience, while recreational development describes the facilities created to support recreation. We see no inconsistency or need for change.

The discussion of recreation is certainly appropriate. When considering shoreline zone recreation development, be sure to allow for those activities that are actually water contact. Such things as swim areas, boat launches, shore access for beach walking, shellfishing, or shore-based line fishing require direct access to the water's edge. Buffers in the traditional sense cannot apply, so will need to be discussed appropriately.

Some general thoughts



In public use areas, much development can be defensive. Some have suggested minimizing shoreline impacts by disallowing hard surface paths. When this is done, public use is uncontrolled. This typically results in a web of user-formed "social trails," which have a much higher impact than carefully designed and constructed formal pathways. This photo of the beach area south of Point Wilson at Fort Worden is a typical example.

Shoreline stewardship is a matter of attitude, and attitude can be formed. Appreciation for shorelines is best built by allowing direct experience, and providing interesting interpretation. Formal paths, including gathering and observation areas and structures, are an integral part of this strategy, and should be allowed in all environments.

Public facilities today are subject to a variety of regulations. One key factor today is accessible design, as required by the Americans with Disabilities Act (ADA) and supporting state and local codes. Guidelines and regulations for public access shoreline facilities should include provisions that allow application of ADA design requirements, such as pathway widths, slopes, and surface characteristics. Careful work now can prevent frustrated visitors and formal civil rights complaints in the future.

Overall, State Park shorelines should be designated so that their appropriate public developments are permitted uses. We need the ability to use applicable rules and

guidelines to create good water access and recreation facilities, without having to expend scarce time and public money on an extra conditional use process.

Site specific information

Nine state park properties under the county's shoreline jurisdiction provide ten and a half miles of fresh water, and seven miles of salt water public shoreline. This is backed up by nearly 4,400 acres of public uplands that provide a wide variety of public use facilities, which support the shoreline access that is often the premier attraction at a park.

Several of these state parks have been part of our agency's Classification and Management Planning (CAMP) process. The CAMP process is introduced on our website at <http://www.parks.wa.gov/plans/>. This process involves a detailed inventory and analysis of each park site, includes significant public participation, and results in management recommendations and internal land classifications. All this is explained in the four separate CAMP reports that apply, which are:

- Hoko River [<http://www.parks.wa.gov/plans/hokoriver/>]
- Miller Peninsula [<http://www.parks.wa.gov/plans/millerpenn/>]
- Sequim Bay [<http://www.parks.wa.gov/plans/sequimbay/>]
- Hoko River CAMP Implementation [<http://www.parks.wa.gov/plans/hokoriver2/>]

The last report listed is a current project. It provides substantial additional detailed information about the project site.

Since the CAMP process is far more focused than the county-wide SMP project, you will likely find that our classifications divide the resource into finer units than the SMP. For example, some beaches have several classifications, with the tidelands, upper beach, and uplands receiving different classifications. In such cases, we recommend that the county apply an environmental designation that will cover all the desired uses described in the CAMP report. We also invite the county to reference the State Park CAMP reports and land classifications, which would have the effect of incorporating our level of detail into the county SMP. This would remind those referring to the SMP of the State Park actions, as well as capture all the State's site specific work for a wider audience. Whether or not the county does this, please know that State Parks will continue to manage these properties according to the approved management plans.

There are two significant properties not yet covered by the CAMP process. Bogachiel State Park is an existing developed park on the river of the same name, at Highway 101. Development there is unlikely to change significantly, so environmental designations that support current activities will be appropriate.

The Sol Duc property, 422 acres on the Sol Duc river, is currently undeveloped. As such, current plans are quite general. There will, of course, be water access features. Examples could include a small boat launch/retrieval site, shoreline trails and

observation points, river fishing access areas, water trail campsite(s), and interpretive development. Forest health work is likely prior to public development. A moderate shoreline designation that will accommodate such work would be best. If a more restrictive designation is assigned at this time, State Parks may request a change in designation as the time for initial development of the site approaches.

State Parks will be happy to address these and other related issues further as the SMP process moves along. We have presentations describing good public design that we can bring to appropriate groups if you wish. And we will continue to review and comment as your effort continues.

Please contact me with any questions or comments. I'll see that they are directed to the most appropriate staff.

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