

Merrill, Hannah

From: Person, Randy (PARKS) [Randy.Person@PARKS.WA.GOV]
Sent: Wednesday, August 10, 2011 11:08 AM
To: zSMP
Cc: Stewart, Jeff R. (ECY)
Subject: ICR comments
Attachments: Clallam County ICR State Parks review comments.doc

Hello, Hannah. Attached are Washington State Parks' comments to the ICR noted below. As you will see, we have concentrated primarily on those sections of the materials that include state park lands. However, there are inconsistencies that suggest the entire document should be gone over carefully to look for similar issues in the reaches that did not fall under our magnifying glass. There is a huge amount of data presented here, and once it is correct and consistent, it will be a valuable resource.

Please contact me if you have any questions.

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From: zSMP [mailto:smp@co.clallam.wa.us]
Sent: Friday, July 01, 2011 12:52 PM
To: zSMP
Subject: Clallam Co. Draft Shoreline Inventory and Characterization Report & Draft Vision Report on-line

Dear Clallam County Shoreline Master Program Interested Party:

There are two reports that have posted to the County Website and we welcome your comments.

The ***Draft Shoreline Inventory and Characterization Report (ICR) for Portions of Clallam County Draining to the Strait of Juan de Fuca*** is now ready for your review, and is available on the Clallam County web site at the following address: <http://www.clallam.net/RealEstate/html/esa-icr-draft6-11.htm>.

The Draft ICR is intended to provide information for the update of the Clallam County Shoreline Master Program. Due to maps and color figures, some of the Chapters are large in file size, so we've separated the report into nine individual chapters, marine reach sheets, freshwater reach sheets, and map files that can be individually downloaded.

Please note that this Report addresses the shorelines of the Strait of Juan de Fuca and rivers (e.g., Dungeness River) and lakes (e.g., Lake Sutherland) draining to the Strait that are subject to the Shoreline Master Program Update. Those rivers (e.g., Sol Duc River) and lakes (e.g., Lake Pleasant) in western Clallam County that drain directly to the Pacific Ocean are being addressed in a separate Draft Shoreline Inventory and Characterization Report being prepared by the University of Washington-Olympic Natural Resource Center (http://www.clallam.net/RealEstate/html/onrc_wria_20_maps.htm).

Draft ICR Review Timeline

We will be discussing the report at the upcoming Shoreline Committee meeting on Tuesday, July 12th, 2011 at 12:30p.m. in the Clallam County Board of Commissioners Meeting Room 160 (223 East 4th St Port Angeles – enter the building double doors facing 4th Street, turn left down the hall, #160 is halfway down the hall on the left). At this stage, we are asking you to please become familiar with the information contained in the report prior to the meeting. We recognize that there is a considerable amount of information and data in the report, so there will be ample time for you to review and comment on the draft ICR following the meeting. Our timeline for Report review is as follows:

- **Initial Comments Requested by: August 31, 2011** *[These initial comments will assist the Consultants and County staff to prepare for the September advisory group meeting (date to be determined) where we will begin discussing shoreline environment designations].*
- **Final Comments to Ensure Consideration by: October 31, 2011**
- **Final Shoreline Inventory and Characterization Report Targeted Completion Date: End of 2011**

The **Draft Clallam Shoreline Vision Statement Report** is at the following link:

http://www.clallam.net/RealEstate/assets/applets/ClallamSMP_Vision_Report_Draft_6-27-11.pdf

The Vision Report also applies to the shorelines that border or flow into the Strait of Juan de Fuca. Input for the Report was gathered in focus group meetings in January, 2011 and public forums in April, 2011.

Hannah Merrill

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No reply to this message is required. You have received this message as a member of the Clallam County Shoreline Master Program (SMP) Interested Parties Email Distribution List. If you do not wish to receive further project notices, reply to this message with "UNSUBSCRIBE" as the subject and body text. Anyone who wants to be added to the list may send an email with "SUBSCRIBE" as the subject and body text. All emails sent to this address will be received by the Clallam County email system and may be subject to Public Disclosure under Chapter 42.56 RCW and as such may be viewed by parties other than the intended recipient.

Regards, Steve

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**Washington State Parks comments on the
Clallam County SMP Inventory and Characterization Report
Made available July 1, 2011**

These comments apply to the group of documents that comprise the Shoreline Inventory and Characterization Report (ICR), which covers those portions of Clallam County that drain to the Strait of Juan de Fuca. These documents include:

- The combined map folio
- The June 2011 draft of the ICR
- The marine water reach sheets
- The fresh water reach sheets

There are general comments, but the majority of our efforts are focused on those areas that include State Park lands:

- MR-1, containing Miller Peninsula state park
- MR-2, containing Sequim Bay state park
- MR-16 and MR-17, containing the saltwater portions of Hoko River state park
- Hoko River reaches 1,2, and 3, and Little Hoko River reach 1, containing the freshwater portions of Hoko River state park

The Shoreline Master Program (SMP) map series is the key summary of shoreline characteristics, providing a wide variety of information in a spatial context. As such, it is imperative that the maps are both clear, stand-alone products, and that they are fully consistent with supporting written documents.

Reach Designations

All the maps of the east region show a reach break approximately in the middle of the north shore of the Miller Peninsula. All other information shows that this is in error and should be removed, to leave MR-1 properly illustrated.

MR-2 is described as ending south of the John Wayne marina, yet the reach break is clearly shown north of the marina. The map shows MR-2 containing the marina and the mouth of Johnson Creek, both significant shoreline features. Related documents show that there is a break in county ICR data corresponding to the shoreline that is within the incorporated boundaries of Sequim. For clarity, the northwest termination of MR-2 should be shown at the south city boundary line. As an aside, it is a shame that the basic inventory document can't be continuous, as the city break is small, and the features contained there impact nearby county shoreline.

Map labeling is inconsistent. On maps such as 2c, 3a, 4c, and 5a, among others, the reach designations are printed directly over the shoreline itself. This obscures the very information the map is supposed to present. There is no need for this – there is plenty of water just offshore to carry the MR designations.

Other Map Clarity Issues

On several sheets, for example 1c, the inset location map does not show the proper section of the county.

The legends of the maps contain apparent errors that make interpretation very difficult. On map 1a, what appear to be arrowhead symbols to show transport zone drift seem to be labeled backwards. Coupled with inconsistencies in the text (discussed later), this makes using the symbology problematic. The map 1b legend has different, mismatched arrows that have the same problem. Map 1c has disembodied arrowheads floating within the rest of the legend. Maps 1b and 1c have the shoreform type and other symbols mashed into or misaligned from the descriptive text. These are all technical errors that should have been caught by reasonable review, which point to the need for a thorough technical review before a next generation is released.

The 18 maps in the portfolio provide the principle graphic support for the ICR itself, especially for Chapter 4, the actual marine reach inventory, and Chapter 6, the freshwater reach summary. The reach information routinely refers to specific landmarks, such as land forms, spits, streams, and so on. To make sense of the descriptions, those places and things need to be marked on the maps.

The first page of the marine reach inventory section discusses MR-1, Diamond Point (which, as a reach, should really be named Miller Peninsula). That page alone mentions 11 different landmarks, fewer than half of which are shown on the map. Later investigation turned up more detailed information in the separate “reach sheet” documents. But this is not the answer. The basic document, text plus maps, will be the prime reference. There needs to be close correlation between the text and supporting maps. Some small details may be unreasonable to show, but certainly such significant features as Travis Spit, Thompson Spit, Eagle Creek and Paradise Cove are important enough to understanding the workings of the reach to deserve labeling.

Similar issues were noted on the other few reaches examined in detail, suggesting that updating all the maps to better support the text may be necessary.

Fish stock representation is confusing. For some reason, information on river use is presented on the Marine Ecological Characteristics maps (3a through 3c), as well as the Freshwater series (4a through 4c). On some sheets, such as 3a and 4a, there appears to be complete duplication – needless, but not misleading. On others, such as 3c and 4c, that is not true. While there is river fish information presented on both, there is different data presented on each. There should be a clear line dividing the inventory areas, with no duplication of data. For instance, marine could include the saltwater shoreline and estuary areas up to the high tide line. Above that would be shown on the freshwater sheets. It seems reasonable that if we want to understand fish concerns around river mile 6 or 7, as would apply to the Cowan Ranch area of Hoko River State Park, the freshwater map would be sufficient. If for some reason that is not the case, it should be clearly explained what material is presented on which map, and why. Also, in

that case, each map should include a clear note that the fish information is incomplete, and refer users to the companion map with the rest of the information.

Maps 5a through 5c, according to Table 1-1, show public and private land ownership. This would be helpful if true. However, based on visible state park lands, most public land is shown simply as “non-residential,” except where erroneously overlaid with private and public commercial forest designations. Conditions at Sequim Bay state park may be different, but most of it is obscured by the reach designation. Without the additional state park ownership information that I have access to, there would be no way to differentiate these lands as parks, or even public.

It is not clear whether the maps include tidelands in their information. They should, for as stated in the box on page 1-3, shorelines include “marine waters between the ordinary high water line and extreme low tide.” This is especially important since tidelands may be owned and/or managed by entities other than the adjacent upland owners. Such is the case for the public tidelands that extend a substantial distance north of the main body of Sequim Bay state park, but it is not obvious on any map. This also means the upper diagram on page 1-4 is deficient, as it should show the intertidal zone, and the waterward extent, to fully describe the marine area of jurisdiction of the SMA.

Reach MR-1, containing Miller Peninsula State Park

Page 4-2, lines 18-20, refer to the north central portion of the reach as “public land managed by DNR,” as well as the undeveloped Miller Peninsula State Park. This misrepresents the actual current land ownership pattern. Further research shows the county records to be inconsistent.

Using the county’s interactive map, an overview of Miller Peninsula shows DNR lands shaded pink, in portions of sections 29, 30, 31, and 36. No land along the Strait of Juan de Fuca is shaded as DNR. This is appropriate, since all the state land along the strait is part of Miller Peninsula State Park, and owned and managed by the Washington State Parks and Recreation Commission (WSPRC). Unfortunately, the “identify” tool gives conflicting information. It shows parcels such as 02301830000, 023018340000, and 023017300000, among others, as owned by State of Washington, Department of Natural Resources.

The over 2,800 acres that make up Miller Peninsula State Park were purchased from the DNR in 1993 and 1994. County records should long since have been properly updated to show the WSPRC as owner of these lands, which front on about three miles of shoreline on the Strait of Juan de Fuca and Discovery Bay. Please contact our GIS coordinator, Kathryn Scott, at 360-902-8691, or kathryn.scott@parks.wa.gov for current data and shape files for all WSPRC lands in Clallam County. She will be happy to provide the information to assure that the state park holdings are properly described.

Page 4-3, lines 19-26, describe future development of Miller Peninsula State Park. Unfortunately, it takes an unwarranted negative approach. Certainly, bad design and uncontrolled public use could have undesirable impacts. However, State Parks is not about doing bad design. In fact, a properly developed access to the beach will likely lessen current impacts, which occur from an informal trail that predates State Park acquisitions in the area. Although volunteers do their best to maintain the route today, stabilization and channelization through appropriate surfacing and structures will minimize erosion and control visitors' route. Such design features to protect the environment are described in our planning report. See information at the end of this document for links.

Reach MR-2, containing Sequim Bay State Park

This reach includes at least one example of the map labels obscuring information. The label on map 5a, land use, is squarely over the park, making it difficult to trace the outlines well. It is also unclear whether the tidelands are shown. This is especially important here, as there is a substantial strip of over a half mile of state park tidelands extending northerly from the main body of the park. These public tidelands front on private uplands, and provide a significant opportunity for public shoreline access and related recreational activities, such as recreational shellfish harvest. This information should be available to consider as the next steps of environmental designation and regulation development occur.

The baseline conditions summary on page 4-5 notes the "northward net shore-drift within the reach." However, both map 5a (presuming we have interpreted the drift arrow symbols correctly) and the reach sheet show the drift being exclusively southward. The inconsistency needs to be fixed.

On the reach sheet, a discussion of recreational shellfish harvest is cut off. Also, the shoreline modifications paragraph describes a long section of beach armoring north of the John Wayne Marina. Interesting, but not part of this reach. Combined with the errors describing the shore drift, which are true north of MR-2, it may be worthwhile to check all statements to assure that they apply to the reach in question.

Consider adding one special management consideration:

Maintain the critical public access opportunities at Sequim Bay State Park, with classifications and regulations that support ongoing sustainable recreational use.

Reach MR-16, containing easterly elements of Hoko River State Park

The ICR states that net drift in this reach is entirely eastward, but map 1c shows the arrowheads pointing westward. In the reach sheet, both the map and text show eastward movement, indicating that map 1c needs correction.

There are a couple issues in the reach discussion that open wider topics. The first is the ambiguous use of the term “shoreline.” Page 4-36, lines 14-15, state:

More than three-quarters of the shoreline in the reach is publicly owned (private timber land); however it is not directly accessible from land.

Now, as well as making us wonder how private timber land can be publicly owned, it really isn't clear what “shoreline” is referring to. In the definitions, taken from the SMA, shorelines are all water plus all shorelands, which include uplands for at least 200'. Therefore, it seems impossible for there to be a public “shoreline” when the uplands are privately owned. Waterward, all bedlands are publicly owned. What's left to differentiate are the tidelands, that area between high and low tide that most folks might call the beach. From review of county maps, we believe that the statement above should be more clearly written as “More than three-quarters of the tidelands in the reach are publicly owned. . .” If this is truly what is meant, the change should be made, and the rest of the document should be examined for similar references.

The statement about the inaccessibility of the tidelands relates to steep slopes in certain areas. However, there is direct legal upland access to about 3,600 feet of public tidelands, with continued access by simply walking the beach to much more. Today, enthusiastic fishers find their way down the steep route to access the stable rocky platform shores. In the future, State Parks plans to improve pedestrian routes to provide better access to this important shoreline resource. Instead of claiming that the tidelands are not accessible, it would be more accurate to note that careful trail development will be required to provide good public access.

The second issue is potential development. Available materials have conflicting information. The reach sheet states that “development in the western end of the reach would consist of moderately-density (sic) residential infill.” However, the ICR notes that the area is zoned R-20 (one dwelling unit per 20 acres), but contains many one to two acre lots. It then states “Development in these lots could result in relatively dense shoreline development.”

It would be helpful for those hoping to understand conditions based on the reports, to explain how dense shoreline development can occur in R-20 zoning. The ICR discusses “many vacant 1 to 2 acre lots.” However, most of government lot 1, section 10, T32N, R13W, is divided into a tight cluster of lots beginning at about ¼ acre. Over two dozen are smaller than an acre. But in the R20 zone, the minimum lot size is 5 acres. Can these small lots actually be developed under current zoning and construction codes? Are these lots grandfathered for setbacks, minimum widths, septic system conditions, and other elements that they do not meet today? In general, please make sure that the discussions of potential development accurately reflect current conditions, that the various SMP documents are consistent with each other, and that potential outcomes are explained in clear language.

Reach MR-17, containing the balance of Hoko River State Park frontage

While ICR text, the reach sheet text, and the reach sheet map all show net shore drift entirely eastward, map 1c shows flow in two directions, converging at the mouth of the Sekiu River. Please correct as appropriate.

Page 4-38, lines 8-9 of the ICR state:

State Parks has recently acquired 1,000 acres near the Hoko estuary; however, no formal parking areas have been established.

In fact, the total acreage of Hoko River state park is about 850. Of this, the majority of about 590 acres is around the Cowan Ranch, most of which lies upstream of the Little Hoko confluence. Another section of about 50 acres is at Eagle Point, fronting on reach MR-16. This leaves roughly 210 acres of State Park land fronting on and lying within about a mile of the easterly end of MR-17. Please correct the ICR, as well as similar language on the reach sheet. For the best data, please contact our GIS coordinator, Kathryn Scott, at 360-902-8691, or kathryn.scott@parks.wa.gov for current data and shape files for all WSPRC lands in Clallam County. She will be happy to provide the information to assure that the state park holdings are properly described.

The report notes that in spite of extensive public ownership along the shoreline, there are no formal, safe developed public access areas. Accordingly, an additional key management recommendation for this reach should be:

Formalize public shoreline access facilities along the reach. This should include at a minimum safe parking, basic sanitary facilities, and safe, designated routes to the intertidal zone.

Hoko and Little Hoko River reaches, containing Hoko River State Park

There are several incorrect references to State Parks' holdings in the Hoko River area. The combined holdings are all included in Hoko River State Park. As described in the Hoko River State Park Management Plan, various sub-units of the park have individual names for identification and discussion. Each name applies only to that particular sub-area. Therefore, Cowan Ranch Heritage Area is improperly used to identify those parts of the park in and around the estuary. The proper citation would be the Hoko River Estuary Property of Hoko River State Park. In similar fashion, those references that do apply should be Cowan Ranch Heritage Area of Hoko River State Park. In any area, Hoko River State Park is sufficient, although the area names are more specific. Also, note the proper spelling of Cowan.

Reach 1, channel configuration discussion is cut off before the end.

The Reach 2 reach summary divides the reach into residential and commercial timber areas. Even though the land use and public access sections note that 16% of the reach

is public land, the summary does not mention that important element. We suggest the following statement be added to the reach 2 summary:

The upstream end of the reach lies within the Cowan Ranch Heritage Area of Hoko River State Park, and includes the primary ranch buildings.

A similar issue shows in the Reach 3 discussion. The following statement would be appropriate:

Approximately 1 ¼ miles of the river at the lower (or downstream, or northerly) end of the reach lie within the Cowan Ranch Heritage Area of Hoko River State Park.

The reach summary for the Little Hoko mentions the park land in a secondary way. In fact, about half of the entire reach lies within Hoko River State Park. This is important to understanding the makeup of the reach, and should be included in the reach summary.

Map 5c, land use, shows the portion of the park in Section 26 on the Little Hoko as commercial forest, both public and private. We understand that zoning and actual use may vary, until corrections can be made. However, it is completely incorrect to label any of Hoko River State Park as private land.

In all the reaches, the riparian vegetation discussion notes various percentage covers for different vegetation types. They discuss from 46% to 89% of the various reaches, but never make 100%. What's growing on all the unaccounted-for land?

State Park Plans

Three properties owned and managed by State Parks are covered in the ICR (Clallam Bay is partially owned by State Parks, and managed by Clallam County). These sites provide 5.3 miles of fresh water, and 5.4 miles of salt water public shoreline. This is backed up by 3,790 acres of public uplands that provide an existing and potential wide variety of public use facilities, which support the shoreline access that is often the premier attraction at a park.

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.

The CAMP process is very focused, and results in the adoption of internal land classifications for each park that complement existing or planned development. These formally adopted plans deserve reference in the ICR, as they establish the long term goals for providing a significant piece of the public access and recreation that are key elements of the legislative declaration that forms the backbone of the SMA.

If you have further questions, please contact the author at 360-352-2471, or randy.person@parks.wa.gov.

Sincerely,

Randy Person, Parks Planner