

Merrill, Hannah

From: Person, Randy (PARKS) [Randy.Person@PARKS.WA.GOV]
Sent: Monday, October 17, 2011 10:57 AM
To: Merrill, Hannah
Subject: RE: NNL August Meeting Summary
Attachments: State Parks Clallam County WRIA 20 comments.doc

Good morning, Hannah. You've earlier received our comments on the Strait watersheds. Attached are State Parks' comments relating to the WRIA 20 documents. Please contact me with any questions.

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From: Merrill, Hannah [mailto:HMerrill@co.clallam.wa.us]
Sent: Friday, October 14, 2011 1:31 PM
Subject: NNL August Meeting Summary

Greetings No Net Loss Workgroup:

Please find the attached August 18 meeting summary (also at:
http://www.clallam.net/RealEstate/assets/applets/NNLWG_Mtg_2Notes_8-18-11.pdf).

Also attached is the SMP Committee September 27 meeting summary (also at:
http://www.clallam.net/RealEstate/assets/applets/SMP_Comm_mtg_notes_9-27-11final.pdf).

Any additional comments on the two Clallam County SMP Inventory and Characterizations Reports are due by **October 31, 2011**; they are linked below and also available on line at
http://www.clallam.net/RealEstate/html/icrs_-_both.htm

1. [*Draft Shoreline Inventory and Characterization Report for Portions of Clallam County Draining to the Strait of Juan de Fuca*](#)
2. [*Draft WRIA 20 Inventory and Characterization Report*](#)

An update on NNL Project Status and upcoming NNL Committee schedule to follow.

Thank you,

Hananh

Hannah Merrill, Natural Resources Planner
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SMP Website: http://www.clallam.net/RealEstate/html/shoreline_management.htm

“There is no wastewater, only wasted water.”

-Michael Read, Water Environment Federation

**Washington State Parks comments on the
Clallam County WRIA 20 Inventory and Characterization Report
Prepared May 16, 2011 and the
Draft WRIA 20 Preliminary SMP Elements Report
Prepared June 8, 2011**

Concerning the Inventory and Characterization Report (ICR)

P12 – Public access to the Bogachiel River – access and recreation, including overnight facilities, is available at Bogachiel State Park, just downstream from the 101 bridge.

P 13 - The Kallman Rd WDFW access (common name: Thomas access) is bank access only, no launch, according to the WDFW water access web page.

P 63 – The State Parks Sol Duc property in sections 29, 32, 33, and others in T 30 N, R 12 W along Mary Clark road is held for future development. As such, the general description of “large blocks of state lands” is appropriate at this time. The land was purchased for eventual development as a full service state park, offering improved access to the middle reach of the river.

P 70 - Public access in reach Sol Duc 60 - Due to the undeveloped nature of the State Park ownership, it is inappropriate to refer to “State Park at 29.5.” To most people, the term State Park infers a certain level of public development, which is not yet available at this property. It would be most appropriate to use the same term as used to describe reach 50, “large public blocks.” If you would like to be specific enough to state agency ownership, a more appropriate description would be “State Park land held for future development.”

The Shoreline Use Map of Sol Duc River 50 shows Sol Duc State Park land incorrectly. An image extracted from State Park land records showing the proper boundaries is at the end of this document. You may receive full GIS-compatible files describing State Parks ownerships in Clallam County by contacting Kathryn Scott, 360-902-8691, or kathryn.scott@parks.wa.gov.

The Critical Areas Map of Sol Duc River 50 is clear and easy to read, as are most of the maps included in the ICR. However, copies in the Preliminary SMP Elements Report are significantly degraded and difficult to interpret. Since only selected maps are shown in the ICR, many of the graphics supporting the WRIA 20 work are hard to use. Please provide access to graphics that will stand up to significant zooming as land managers look for details about their specific areas.

From the SMP Elements Report

P 2 - The discussions of the Natural, Conservancy, and Rural environments are inconsistent in dealing with public access and recreation. Natural mentions maintaining shorelines “for the benefit and pleasure of future generations.” Recreation and public access are encouraged, as long as they do not “degrade the area.” The Rural environment, which includes the possibility of commercial waterfront developments, includes public recreation as a preferred use. Unfortunately, the Conservancy discussion does not address public access or recreation at all, unless they are intended to be in the very general statement “non-consumptive uses are preferred.”

The State Parks Sol Duc property lies partly within Sol Duc reaches 50 and 60. Reach 60 is currently Conservancy, while reach 50 is Rural, but with cautionary language about providing protection for extensive wetland areas, which cover much of the Section 29 portion of the State Park land. It is imperative that this land be classified to allow appropriate public shoreline access development, including facilities such as:

- boat launch and retrieval sites
- trails, including ground surface and raised construction, as conditions dictate
- fishing and/or observation platforms to provide access to the water’s edge for education and access for citizens of all abilities
- interpretive signs and other development to increase appreciation for and stewardship of shoreline areas
- basic day use amenities such as picnic tables, benches, and small, open shelters (these facilities would be back from the water’s edge, but likely still within the typical 200’ shoreline zone).

More intensive development, such as roads, parking areas, restroom buildings, campgrounds, and administrative facilities would as a matter of course be only constructed on suitable uplands outside the shoreline zone.

It is common for such basic public access facilities as noted above to be allowed uses in intermediate shoreline classifications, such as Conservancy. We encourage you to specifically address public access and recreation in the Conservancy discussion, and note that such appropriate development is a permitted use. In considering this, note that when an area is developed for public use, use of the shoreline will increase significantly. The best way to manage impacts is through good design and defensive development.

P 4 - Recommendations 2 and 3 discuss retention of or changes to current reach classifications, including Sol Duc 50 and 60. Currently, reach 50 is Rural, while reach 60 is Conservancy. The break between these two reaches is the common section line between Sections 28 and 29, T 30 N, R 12 W. Although this divides the State Park ownership into two different classifications, that should not be an issue as long as appropriate development as discussed above is permitted in the Conservancy designation. See more details further on.

P 12 - The discussion of Bogachiel 30 fails to mention the only developed state park in WRIA 20, located immediately downstream of the 101 bridge on the north bank of the river. The discussion suggests designation of this newly proposed reach to separate the two banks of the river. The north bank would receive a Rural designation, allowing for development along the side readily accessible from the state highway. State Parks supports this designation.

Designating shorelines always tries to strike a balance between preservation of shoreline values and legitimate access to and use of the shoreline. It is worth noting that Bogachiel State Park has been developed for over 50 years, providing camping, day use, and river access opportunities to over 60,000 visitors per year. Yet the shoreline is found to provide a 100% closed canopy backdrop, with other natural vegetation along the water's edge. This demonstrates that public recreation and river access, as developed and operated by Washington State Parks, can indeed provide desired public access while maintaining vital ecological functions.

P 15 - This discusses proposed Bogachiel 40, and suggests it remain in its current Rural classification. This would affect a small portion of Bogachiel State Park upstream of the 101 bridge. State Parks supports this recommendation.

P 44 - Recommendation 17 questions whether the extensive wetlands documented in Section 29 of Sol Duc Reach 50 need additional protection. The reach is currently classified as Rural. State Parks suggests that further protection through modifications of the Shoreline Master Program is unnecessary. Wetlands have their own set of regulations that provide sufficient protection. Prior to future development, any proposals that might impact wetland areas would include site specific wetland inventory work. Any public facilities proposed for wetland areas, such as boardwalks and interpretive installations, would be primarily to control public access while providing for visitors' constant desire to explore.

This is actually a good spot to consider a shift of the Reach 50/60 boundary. The current boundary is a section line near the center of the 420+ acre State Park area. The environment upstream of the boundary is mainly vigorous conifer forest, typically less sensitive than the mixed deciduous stand along Reach 50. If the reach boundary was moved to the State Park easterly boundary, the entire park would be within the same Rural designation. This would allow for appropriate public access development within suitable environments. Sensitive areas would remain protected by the regulations applying to them, which nicely parallel good park planning practices. As demonstrated at Bogachiel State Park, Washington State Parks is adept at providing public shoreline access and recreation while maintaining a high level of environmental integrity.

P 45 - As discussed above under the ICR, the park boundary shown in the lower map is incorrect. Please see above for information on obtaining current boundary files.

Generally, the maps and other images in the SMP Elements Report are lower quality than the same ones shown in the ICR. It would be very helpful to have the images available at a quality that would make the legends and symbology legible at any scale.

To be truly effective, it is essential in documents such as these that graphics support and are easily referenced to the information in the text. Throughout both reports, there are constant references to specific locations using river mileage points. Unfortunately, none of the graphics have any river mile markings, making it impossible to find the referenced locations, unless there is other information available. There is a tremendous amount of information in these two documents. The ability to easily and accurately locate places on the maps would increase their usefulness by an order of magnitude. At the very least, mileage points should be shown at the reach breaks. Rough estimates could be made from these known points.

Here is the current boundary of the State Parks Sol Duc property. This information is available in digital format by contacting Kathryn Scott, 360-902-8691, or kathryn.scott@parks.wa.gov.

