



January 15, 2013

City Council  
City of Bainbridge Island  
280 Madison Avenue North  
Bainbridge Island, WA 98110

Dear Members of the City Council:

The Park District is commenting once again on the draft SMP update, which we understand the Council will consider at its January 17, 2013 meeting. Not having had the opportunity to review any changes that may have been made to the SMP draft since the Council last considered it, we can only reiterate our deep concerns about some key elements in the plan.

### **Blakely Harbor Park**

The Park District continues to be adamantly opposed to the designation of the log pond at Blakely Harbor Park as "Natural" for all the reasons spelled out in our letter to the Council, dated August 30, 2012. The letter is attached. Also attached is the Park District's concept plan for the park.

We understand that the so-called "Honeymoon Meadow" would be carved out as an area for more active uses, such as one-time special events. However, maintaining this area in its current configuration would be subject to mitigation, which would likely close off existing view corridors and prohibit development of future viewing sites within the proposed 200 foot buffer.

As noted in the attached letter, the District's plans for the south and west shores of the log pond include only minor access improvements, such as upgrading and maintaining existing shoreside trails that have been overgrown by invasive species, placing a few picnic tables in places where people can enjoy the water view while they have a meal, and opening up strategically placed viewing areas along the shoreline. These are all uses compatible with the park's setting and with the park's earlier proposed designation as "Island Conservancy". They would be prohibited under a "Natural" designation.

It is our understanding that changing the designation of the Blakely log pond was proposed in a 2011 letter from FutureWise. Among other comments, FutureWise proposed that the Close Property be designated "Natural", a suggestion with which the Park District concurred. However, along with its suggestions on shoreline areas to be designated "Natural", *FutureWise also recommended that more used be allowed within the "Natural" designation than are currently permitted in the City's draft* (emphasis added). City staff adopted only the change of designation and did not permit more uses within the "Natural" designation, except for permitting one trail to access the shoreline.

For all these reasons, the District strongly urges the Council to designate the entire shoreline of Blakely Harbor as "Island Conservancy", as was the case in previous drafts. Changing the designation of any portion of the log pond to "Natural" is inconsistent with current and long-standing use, impedes the District's ability to fulfill its responsibility to the public, and is inconsistent with surrounding shoreline residential uses. It flies in the face of private citizens who raised the funds to acquire this property to preserve it for public enjoyment.

## **Waterfront Park**

Our understanding is that the City plans to renew Waterfront Park and the dock in the near future. The Park District has an interest in this redevelopment project because many of our water-based recreation classes (e.g., sailing) use the dock. For that reason, we ask that the Council consider whether or not designating the park "Island Conservancy" might limit the City's options in refurbishing this property. Possible limitations include required revegetation with native species after the removal of invasive plants, restrictions on view corridors, and requirements for revegetation to mitigate for any change within the 150 foot buffer. Such a change would likely include removing the boat stage. The City may wish to consider whether designating this park as an "Urban Park" would more accurately reflect its use, location, and uses of surrounding properties.

## **Vegetation Management**

We appreciate the Council's direction to City staff to work with the Park District in making the vegetation management requirements in the draft SMP more workable for staff at both the City and the Park District. We are hopeful that these efforts will allow the City to satisfy its responsibility for monitoring vegetation management in the Island's shoreline jurisdiction and, at the same time, streamline reporting and review activities for staff.

Thank you for your consideration of the Park District's comments.

Sincerely,



John Thomas Swolgaard, Chair  
Board of Commissioners  
Bainbridge Island Metropolitan Park & Recreation District

cc: City Planning Department  
Park Commissioners  
Terry Lande, Park District Executive Director  
Perry Barrett, Park District Senior Planner

Enclosure

August 30, 2012



City Council  
City of Bainbridge Island  
280 Madison Avenue North  
Bainbridge Island, WA 98110

Dear Members of the City Council:

In letters to the Planning Commission, dated May 7, 2012, and to the City Council, dated May 18, 2012, the Park District has formally stated our opposition to any portion of Blakely Harbor Park being designated as "Natural" for purposes of the Shoreline Master Plan (SMP). We believe that the park should be classified as "Island Conservancy", consistent with the proposed designations for all other shoreside parks, with the exception of the Close Property shoreline, for which the Park Board agrees with the City's proposed "Natural" designation. On August 23, 2012 at a Park Board work session attended by Park Commissioners, Park staff, members of the City's planning staff, and Council Member Bonkowski, the Park Board was asked to provide the City with a written request stating the reasons why Blakely Harbor Park should not be "downzoned". This letter has been generated in response to that request.

Blakely Harbor Park has historically provided and currently provides a variety of uses both active and passive, all of which are permitted under the current Shoreline Master Plan. In 2001, the Park District adopted a concept plan for the park. While not a true site plan, the District has been using the document as a guide to develop the park as time and finances permit. By reclassifying the South shore of the log pond as "Natural", many of the currently allowed and planned uses, both current and historical, will be prohibited within 200 feet of the shoreline.

Both active and passive use will either be prohibited or greatly restricted by the reclassification in the "Honeymoon Meadow" adjacent to Country Club Drive, and other areas of the park. These activities are typically not water-related or dependent. However, public use of this area has been historical and preceded the Park District's acquisition of the property in 1999. Under the proposed SMP, except as noted in Paragraph 6 of Section 3.2.5.3 Management Policies, all public use except for cultural events and passive recreational uses would be prohibited within 200 ft. of the shoreline. Even those uses would only be allowed subject to compensatory mitigation. Since the meadow is bordered on the North and South by Mac's Dam and Yama Creeks, which both have salt-water estuaries, a 200 ft. setback would effectively eliminate all activities in the meadow as the area outside the 200 ft. buffer would be extremely small.

The proposed SMP only allows trails that access the water, but not those that parallel the shoreline. The park has trails that roughly parallel the shoreline within the proposed "Natural" area. Many of these trails are within the proposed 200 ft. buffer and would be prohibited. Even if existing trails were grandfathered, under the proposed standards, maintenance would be extremely difficult and cost-prohibitive.

Per our concept plan, the District plans to develop areas along the shoreline that would allow users to view the harbor and horizon from different angles. This would be prohibited under the proposed guidelines.

Passive picnic areas require a 50 ft. setback under the current SMP. The "Natural" designation would prohibit these facilities, an action that significantly restricts users' enjoyment and use of the park's shoreline.

The District's plans for the South and West shores of the log pond include only minor access improvements, such as upgrading and maintaining existing shoreside trails that have been overgrown by invasive species, opening up strategically-placed viewing areas along the shoreline, placing a few picnic tables in places where people can enjoy the water view while they have a meal, and allowing public use in the meadow. Enclosed is one of the drawings from our concept plan that we've been using to guide our work. We believe that these are all uses compatible with not only the park's actual setting, but the "Island Conservancy" designation as well.

It is important to note that Blakely Harbor Park is a highly-disturbed post-industrial site. As such, the topography of the land is relatively flat and covered with invasive vegetative species, particularly in the understory. The District believes that designating any part of Blakely Harbor Park as "Natural", including the South and West shores of the log pond, is inappropriate, inconsistent with current and long-standing use, impedes the District's ability to fulfill its duty to the public, and, as it essentially removes all viable use of the property may constitute a regulatory taking from an unwilling property owner. The "Natural" designation is also inconsistent with surrounding shoreline residential uses. The Park District therefore requests that the entire shoreline area of Blakely Harbor Park be designated as "Island Conservancy".

Very truly yours,



Kenneth R. DeWitt, Chair  
Board of Commissioners  
Bainbridge Island Metropolitan  
Park & Recreation District

cc: City Planning Department  
Park Commissioners  
Terry Lande, Park District Executive Director  
Perry Barrett, Park District Senior Planner

Enclosure

