



March 25, 2013

Kathy Cook, Director
Community Planning & Development
City of Bainbridge Island
280 Madison Avenue North
Bainbridge Island, WA 98110

Dear Director Cook,

We appreciate staff and City Council's efforts at overseeing the SMP (Shoreline Master Program) as part of our local obligation to provide a programmatic update to Washington State. We understand that the planning process is still continuing subject to local review and State plan determination.

In light of this continuing process, we want to share new information about Blakely Harbor and Blakely Harbor Park that was recently released by the State of Washington as part of a regional and local analysis. This information is significant in terms of the proposed designation of the log pond as "Natural" and proposed restoration projects.

We also want to draw your attention to several other important factors that argue in favor of designating this shoreline as "Island Conservancy".

A report recently published by PSNERP (Puget Sound Nearshore Ecosystem Restoration Project) and its Strategies for Nearshore Protection and Restoration in Puget Sound, 2012 technical report 2012-01, provides an analysis of this site in the context of other regional sites. We think this report is important information to share. The entire report can be found on the PSNERP website at http://www.pugetsoundnearshore.org/technical_papers/psnerp_strategies_maps_lowres.pdf.

In discussing Blakely Harbor Park, this report takes note of built structures termed "impediment" as well as the southern beach outside of the log pond and park boundary encompassing the southern portion of Blakely Harbor. However, according to this PSNERP report, it is Murden Cove, Hidden Cove and the western shore side of the island near Gazzam Park that are the highest shoreline priorities for restoration, enhancement and protection.

During the review of the draft SMP by the Planning Commission, the designation of the log pond at Blakely Harbor Park was changed from "Island Conservancy" to "Natural" in response to a comment letter from FutureWise (March 29, 2012). Among other things, this letter recommended two related changes regarding the "Natural" designation for shoreline properties. One recommendation was to amend the definition of "Natural" to bring it more in line with the State's SMP guidelines which allow more uses, including low-intensity development within shoreline properties designated "Natural" (page 2 of above referenced letter). Assuming that this definition was amended, the other recommendation was to designate additional shoreline properties as "Natural". FutureWise identified several properties that could be designated "Natural", including the Close portion of Gazzam Park and the log pond at Blakely Harbor.

In response to this letter, City staff added one permissible use on properties designated "Natural" – a single trail to the shoreline. The staff also proposed designating the Close shoreline and the log pond at Blakely Harbor as "Natural".

The Park District agreed that the change in designation for the Close portion of Gazzam Park made sense. However, because the "Natural designation" would not permit low-intensity development, such as picnic tables and viewing points, within the 150 foot shoreline buffer, the Park District continues to oppose the "Natural" designation for the log pond portion of Blakely Harbor Park.

In light of this information, the Board's preferred classification for Blakely Harbor Park remains "Island Conservancy". We think this classification balances the Washington State imperative to protect and foster habitats for endangered species as well as protect historical resources – important to State of Washington and federal review.

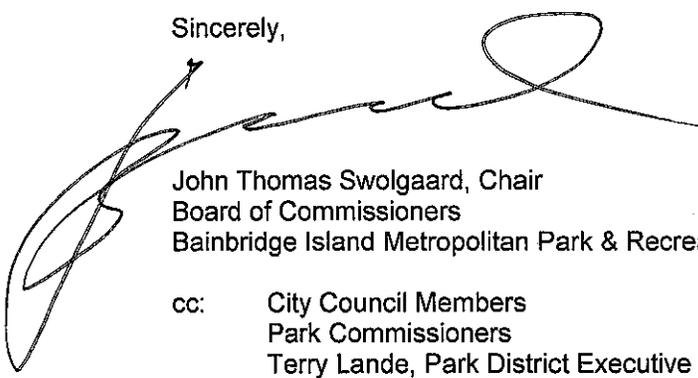
The "natural" designation, as Bainbridge Island SMP documents describe the term, reflects sites that are largely unaltered and naturally sustaining landscapes.

The SMP classification, "Island Conservancy" allows for environmental and historical characteristics at park sites and fits site data at Blakely Harbor Park. The "Island Conservancy" designation specifically cites uses that "enhance or result in restoration of ecological functions." Additionally, this definition provides "water-dependent and water-enjoyment recreation facilities that do not deplete the resource over time, such as boating facilities, angling, wildlife viewing, trails, and swimming beaches and are preferred". Additionally, in keeping with the State covenant that runs with land and original state grants and its matching donations, this classification is also consistent.

The "Natural" designation fails to consider the historical concerns and site evidence known to DAHP (Department of Archaeology and Historical Preservation) at this site. Further, "Natural" sites are classified by SMP definition as landscapes "free of structural shoreline modifications, structures and uses". Designating the park as though it has no historical shoreline alterations or uses does not make it so. Such action is not productive – particularly in light of the fact that another City organization, the Historic Preservation Commission, awards the "Blakely Award" to projects with historical merit, thereby acknowledging the importance of Blakely Harbor's history.

In light of new PSNERP report, the two-part recommendation of FutureWise, the historical importance of this site, and the long-standing low-impact, water-dependent recreational uses of this site, we again strongly recommend that this park site be classified "Island Conservancy".

Sincerely,



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

cc: City Council Members
Park Commissioners
Terry Lande, Park District Executive Director
Perry Barrett, Park District Senior Planner