



May 18, 2012

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

Re: Shoreline Master Plan

Honorable Members of the City Council,

In preparation for your review of the draft update of COBI's Shoreline Master Program (SMP), the Board of Commissioners of the Bainbridge Island Metropolitan Park & Recreation District offers the following comments.

The Park District supports the City's efforts to achieve No Net Loss in the quality of the nearshore environment around the island. To that end, members of our staff and elected representatives have worked long and hard with the City's Planning Department, citizen working groups and the Planning Commission since 2010. Throughout this process, we have offered many comments on the draft SMP. We have also raised concerns about the how the draft would affect the Park District's ability to carry out our mission for the public, particularly providing recreational and view access to the water.

The District believes that, as it relates to parks, the city's draft SMP does not serve the best interests of island residents. Four out of five Islanders do not live on the waterfront; their only access to the water for both passive and active recreation is through our island's parks and road-ends. As you are aware, enhancing public access to shorelines is one of the required elements in the SMP update. Enhancing public access to the shorelines is also a component of the State's SMP. Enhancing public access is also a major component of the District's mission.

The citizen work groups, staff of the planning department, and the Planning Commission recognized many of our specific concerns and made some changes to the draft SMP regulations. However, the Park District still has some major concerns:

Shoreline Designations

The various shoreline designations and the related regulations in the SMP are designed for residential and/or commercial use and are inappropriate for parks. Private land owners are primarily interested in the private use of their properties and, with few exceptions do not typically allow public access to the waterfront. The opposite is true of island parks. As a taxpayer-funded public agency, the Park District has the duty and obligation to provide public access for and to accommodate a wide variety of users and uses. By law, the city is an Urban Growth Area. The city's draft SMP does not recognize this. The District is extremely concerned that the Island Conservancy designation will severely limit future use and access to the shoreline on publicly-owned land for the following reasons:

1. First, the majority of the island's shoreside parks (Waterfront and Strawberry Packing Plant Parks, which are owned by the city; and Fort Ward, Fay Bainbridge, Hawley Cove, T'Chookwap, Hidden Cove, Fairy Dell, and Rockaway Beach, which are owned by the Park District) are located in high density urban settings, and should be designated as Urban Parks, not Island Conservancy. (Hawley Cove already has significant use restrictions. Designating it as Island Conservancy is not only inconsistent with the surrounding development, but the designation could prevent the building of improved beach access for people with mobility impairments).

2. Second, the District has issues concerning assigning the Island Conservancy designation to parks not located in high density areas. No part of Blakely Harbor Park should be considered as a Natural Area. Blakely Harbor is not Natural! The entire park was the site of a lumber mill and accompanying worker housing and has significant historical remnants. Some sections of the park including the area west of the log pond have historically been and are currently used and scheduled for a variety of active use purposes. The District's Conceptual Plan for Blakely Harbor Park was put together by a citizen's task force and adopted by the District. Pritchard Park has a similar history, including a draft plan that was adopted by both the city and the District. Both sites are encumbered with deed restrictions that limit uses. The draft SMP could put both plans in jeopardy, negating hundreds of hours of dedicated work by staff and citizen volunteers. As with the parks that are in a more urban setting, we believe that an Island Conservancy designation will further restrict public access to and views of the shoreline. While located in a lower density area, Williams-Olson Park on Manzanita Bay already has significant use restrictions placed on the title. Requiring a 200 foot buffer would greatly harm the potential for enjoyment of the park's waterfront and further restrict uses currently allowed while doing little to protect native vegetation. West Port Madison Park is in a medium-density neighborhood. Requiring a 200 foot buffer would prevent public access to the bluff and its spectacular views. As with Williams-Olson Park, Island Conservancy designation could lead to restrictions or the elimination of currently allowed uses. The District is not opposed to classifying the shoreline area of the Close addition to Gazzam Lake Park as "Natural"; deed restrictions limiting the use of the site make the Island Conservancy designation unnecessary and inappropriate.

Size of buffer

The District believes each park should have flexible buffers that are appropriate for the current use of each individual site. As was noted in our previous comments, the relevant scientific studies cannot definitively say whether quadrupling the current 50 foot native vegetation buffer to 200 feet will significantly improve the nearshore environment – particularly given that the Park District already practices environmentally responsible vegetation management. However, quadrupling the buffers and restricting public access within those buffers will certainly adversely affect waterfront access and recreational use of park shorelines.

Complexity of Vegetation Management requirements

The Park District has professionally trained staff that is certified in the areas of vegetation management, including forestry, arboriculture, and turf management. We have the experience, expertise, and capability to determine which combinations of plants are best suited for each shoreside park. We believe that utilizing these resources provides a much more effective way to manage the sites than to apply a single template that is really designed for residential purposes and not easily adaptable to a public park setting.

Unfortunately, the city's draft SMP fails to recognize that the Park District is an independent public agency, and that parks serve a different function from private property. Unlike private land owners, the District is legally required to represent the best interests of all residents. We have a team of professional land managers who are tasked to steward our lands in an environmentally responsible manner. The City Council has often gone on record stating that the City needs to "get out of the park business" and let the District manage all island parks. The updated Shoreline Master Program, as currently drafted, does exactly the opposite. It places the City right at the center of policy decisions related to every shoreside park.

In summary, the State's Growth Management Plan legally classifies Bainbridge Island as an Urban Growth Area. In keeping with this designation, the Park District requests that all of the island's shoreline parks be designated as urban parks and that they have buffers and vegetation management requirements no more restrictive than those contained in the State's SMP guidelines for urban areas. We believe that the Island Conservancy designation as proposed by the city's draft SMP is inappropriate and needlessly restrictive. Designating parks as "urban" does not mean that each one will be intensively developed into active use. The designation does allow the Park District to develop appropriate use plans with public input and manage the properties in a professional manner consistent with the needs of island residents and with the goal of No Net Loss in nearshore environmental quality.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kenneth R. DeWitt", with a horizontal line extending to the right.

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

cc: Park Board of Commissioners
Executive Director Terry Lande, BIMPRD
Senior Planner Perry Barrett, BIMPRD