

16 March 2020

To: David Greetham, Senior Planner, City of Bainbridge Island (COBI)

From: Rick Spaulding, 6765 NE Day Rd., Bainbridge Island

Re: Wysong-Ziemba Dock Application; Project Number: PLN50280C SSDP & SVAR

Dear Mr. Greetham,

I write to oppose the grant of a variance to allow the Wysong-Ziemba applicants to build a 240-ft pier-ramp-float, or any other dock of similar length and construction, on Little Manzanita Bay. I have a Master of Science degree in Wildlife and Fisheries Science and am a Certified Wildlife Biologist (The Wildlife Society [TWS]) with approximately 30 yrs of experience in wildlife management. My experience includes wildlife surveys in 40 states, 2 U.S. Territories, and 4 countries for birds, marine mammals, reptiles, and amphibians; conducting endangered species and migratory bird surveys; preparing 10 integrated natural resource management plans for large military installations; managing and preparing 50 NEPA documents (e.g., Environmental Impact Statements, Environmental Assessments), 40 Biological Assessments/Evaluations in support of Endangered Species Act (ESA) section 7 consultation (for both terrestrial and marine species), 20 documents in support of Marine Mammal Protection Act (MMPA) consultations for the issuance of Incidental Harassment Authorizations or Letters of Authorization, and Migratory Bird Treaty Act (MBTA) survey reports and impact analysis.

I have been an active member of TWS for almost 30 years. TWS is recognized nationally and internationally as the preeminent scientific body addressing wildlife issues. I have been a TWS Certified Wildlife Biologist since 2000. A Certified Wildlife Biologist is “an individual with the educational background and demonstrated expertise in the art and science of applying the principles of ecology to the conservation and management of wildlife and its habitats, and is judged able to represent the profession as an ethical practitioner.”

My wife and I have lived on W Day Road since 2002 and are very familiar with the Little Manzanita Bay project area. We drive by an average of 4-5 times per day and throughout the year often take the short walk from our house to the beach area at the end of Dock Street to watch bald eagles, seabirds, and marvel at the incredible views of the Olympic Mountains to the west. The proximity of the relatively unspoiled Little Manzanita Bay with its abundant wildlife, including a pair of nesting bald eagles, and its natural beauty were some of the reasons we chose to purchase a property on W Day Road.

The following provides detailed comments on the project application materials.

1. Project Narrative

Proposal

Pg 1, para. 1, last sentence: “The proposal represents a significant net gain of shoreline ecological functions and processes over what currently exists.” The information provided in the permit application documents do not provide analysis or supporting information to support this assertion. Further comments on this item are provided below.

Mitigation

Pg. 1, item 1: applicants state they are proposing to remove the current creosote-treated wood pilings. The pilings must be disposed of in an authorized disposal site. What is the disposal plan for these pilings?

Pg. 1, last para., 1st sentence: the listed “97.22% reduction inn the amount of material making contact with the substrate in the nearshore marine areas” is inaccurate and misleading. The math is simply wrong and further comments are provided below.

Pg. 1, last para., 2nd sentence: “creates an additional 642 square foot pocket beach.” This is incorrect. There is currently a 552 ft² pocket beach (see item 3) and the proposal would only add 90 ft² to the existing beach. Removing the quarry spalls behind an existing beach does not create a new beach. You cannot get credit for creating something that is already there. Just because the area in question has a rock retaining wall behind the beach, does not mean that the beach does not currently exist.

Pg. 1, last para., last sentence: “Together, this represents a significant benefit to the shoreline environment and a significant increase in the size of the benthic zone,...” This is incorrect. Removing the current retaining wall (“quarry spalls”), which is not inundated at high water, does not increase the area of benthic zone because that area is not within the benthic zone.

Benefits

Environmental

Pg 1, 3rd bullet: “The joint-use covenant required under Section 6.3.7.4.2 of the SMP guarantees adequate maintenance of the structure and the associated uplands in perpetuity.” Nowhere in the *Draft Agreement Regarding Covenants, Conditions, Restrictions, and Easements for the Use, Maintenance and Preservation of Dock* (i.e., joint-use covenant) is there any mention of the maintenance of the dock or uplands in perpetuity.

Pg 2, 2nd bullet: “The only contact with the substrate will be reduced...to approximately 13.8 square feet of steel pilings...” This is incorrect and math is wrong. As stated in the applicants’ materials, 24, 10-inch (or 0.83-ft) steel pilings would be used. This equates to the following: $\pi(0.83/2)^2 \times 24 = 12.98 \text{ ft}^2$. While I realize this is not a significant difference, I bring it up to illustrate that lack of attention to detail that the applicants’ and their consultant used in preparing the application. For example, on pg 4 of the SEPA Checklist, the area listed for the 24 steel piles is 20 ft². This is an example of the many inconsistencies throughout the application materials.

Pg 2, 3rd bullet: “The existing structure is opaque and prevents light from penetrating to the water and substrate. The proposed structure will include the maximum amount of light grating possible, consistent with Section 6.3.3.3(c) of the SMP.” As stated in Project Narrative (pg 1, Mitigation Item 1), the current dock shades 496 ft². Using the numbers from the Abbreviated Biological Evaluation (ABE) (Pgs 5-6, Items 1a, 2b, and 4a), the proposed dock would have an area as follows:

- Pier: $140 \text{ ft} \times 4 \text{ ft} = 560 \text{ ft}^2$
- Float: $60 \text{ ft} \times 8 \text{ ft} = 480 \text{ ft}^2$
- Ramp: $48 \text{ ft} \times 3 \text{ ft} = 144 \text{ ft}^2$

Therefore, the total coverage = $560 + 480 + 144 = 1,184 \text{ ft}^2$. If one uses the required grate openings per the ABE (Pg 7, Item 7b), which the applicants have agreed to implement, the area shaded by the proposed dock would be:

- Multi-direction grating with 40% open space = $0.6 \times 1,184 \text{ ft}^2 = 710.4 \text{ ft}^2$

or

- Square grating with 60% open space = $0.4 \times 1,184 \text{ ft}^2 = 473.6 \text{ ft}^2$

Therefore, the net gain of non-shaded area associated with the proposed dock is only ~22 ft², if the applicants choose to use the square grating with 60% open space. But this is probably an overestimate as the other associated infrastructure associated with the proposed dock (e.g., 24, 10-inch steel piles, wiring and conduit under the proposed dock, boat lifts) will all add shading to the proposed area of the dock. I see no net benefit based on less shading from the proposed dock, and in fact, it seems more likely that the area that would be shaded will be greater than the existing dock.

Pg 2, 10th bullet: “The pocket beach will provide important isolated habitat for a variety of plants and animals, such as kelp, red algae, mussels, snails, limpets, and sandpipers.” This is ecologically false. Beach

habitat is not utilized by kelp, red algae, mussels, snails and limpets. And I seriously doubt that sandpipers will use the pocket beach given the proximity to the dock and associated activities. In my almost 20 yrs of living on Bainbridge and walking along Manzanita Dr. at least 5 times a week during different times of the day, I have never seen any shorebird use the current beach on the subject property. I am a wildlife biologist and am consciously looking for birds and other wildlife.

Pg 2, 11th bullet: should be sand lance not ‘sand lace’. Again, a minor item, but it points to the lack of attention to detail and review by the applicants and their consultant who prepared the application materials.

Pg 2, 14th bullet: “The dock represents a viable alternative to an additional mooring buoy, which would be opposed by the Suquamish Tribe due to the potential for shellfish damage.” This argument is false and laughable. The installation of 24, 10-inch steel piles for the proposed dock would result in the disturbance of a much greater area than installation of a single mooring buoy. The applicants currently use a mooring buoy in Little Manzanita Bay. Did the Suquamish Tribe previously oppose the installation of that mooring buoy?

Pg 2, 15th bullet: “The project is supported by the Suquamish Tribe.” This is an unsubstantiated claim unless a letter from the Tribe is provided that states their support.

Navigational

Pg 2, 1st bullet: “The proposed dock will be elevated, and will allow small boats (kayaks, canoes, rowboats and small power boats) to pass under it, even at the lowest tides.” This is another laughable statement. You really think that constructing a 240-ft dock across a small shallow bay will not result in a navigational hazard? Will paddleboarders be able to go under the proposed dock at low tides? Why would kayakers, canoes, etc. wish to go under this huge dock? And while it may be conceivable that people can go under the dock, the presence of 24 steel pilings present a significant navigation risk to all water users.

Aesthetic

Pg 3, bullets 1 – 4: It is obvious from the statements in Bullets 1, 2, 3, and 4 that the applicants do not have a good understanding of aesthetics or the concept of a view shed. The existing viewshed **does not** feature “many similarly-designed docks, piers, and floats.” Only one similar type dock is in view and that is to the west on Manzanita Bay and is not intrusive to the views from Manzanita Dr. and the associated waterfront homes. The applicants state the “views will change, but not in a way that is incompatible with or impairs what is already there.” This is another laughable statement. Currently there are only 2 small docks on Little Manzanita Bay. More importantly, what about the viewshed for the waterfront properties to the south of the subject property that look towards Manzanita Dr.? They will see a monstrous 240-ft dock where currently only 2 small docks (including the applicants 83-ft current dock and a 93-ft dock north of the subject dock) are visible. How can you state that the addition of a steel dock, with 24 steel piles, lighting, and boat lifts will not impair what is already there??

Pg 3, 6th bullet: “Most houses in the area face the Olympic Mountains, and the proposed dock does not interfere with any of these views.” Incorrect statement. Many homes are to the south of the subject property and do not have views of the Olympic Mountains. Rather, they have a view of a small undisturbed bay. The views of these homeowners will be significantly impacted with the addition of a 240-ft monstrosity in Little Manzanita Bay.

Pg 3, 8th bullet: “The chance of similar docks being constructed to the South of the project is minimal to nonexistent because of inadequate water depth and land configuration.” This is demonstrably false and misleading. The applicants are proposing a dock because of “inadequate water depth” at their property. So why couldn’t property owners to the south also request a variance and construct a dock of adequate length to reach deeper water? In fact, the granting of a variance to the Wysong-Ziemba property would create a precedent and potentially allow for additional longer docks to be constructed within Little Manzanita Bay.

Pg 3, 9th bullet: “The design of the proposed dock is clean and attractive and the joint use covenant required by Section 6.3.7.4.2 of the SMP will guarantee proper maintenance of both the dock and the associated uplands in perpetuity.” As stated previously, nowhere in the *Draft Agreement Regarding Covenants, Conditions, Restrictions, and Easements for the Use, Maintenance and Preservation of Dock* (i.e., joint-use covenant) is there any mention of the maintenance of the dock or uplands in perpetuity.

Usability

The proponents state that the proposed dock will increase their use of the dock from 63% of the time to ~95% of the time. First, the use will only increase to their benefit, not any other users of Little Manzanita Bay. Second, so those that have homes on or look upon Little Manzanita will have to see a monstrous 240-ft dock just so 2 families can enjoy their motorboats 32% more? This is incredibly selfish, self-centered and does not promote a community-centered ethic.

2. Code Analysis

Shoreline Variance Criteria

Pg 1, Item 4.b.i: Applicants currently have a mooring buoy that allows them to use their boats at all tide levels. Why can’t they continue to use the mooring buoy and use a skiff or dingy to access the buoy at low tides. All the other waterfront homes either use a mooring buoy or understand the need to plan their boating activities according to the tides.

Pg 2, Items G.4.a.iii and G.4.a.iv: Applicants state, “Manzanita Bay is almost completely developed with singlefamily residential uses, most of which have private docks providing access to navigable water during virtually all tide levels. Manzanita Bay is currently zoned Shoreline Residential and designated Shoreline Residential in the Comprehensive Plan. The proposed dock is a joint use dock that is similar in length and design to these docks.” First, one cannot include Little Manzanita Bay with Manzanita Bay. They are completely separate water bodies and are charted as such on NOAA charts. They also comprise different watersheds. Prepared for COBI, the *Bainbridge Island Nearshore Habitat Characterization & Assessment, Management Strategy Prioritization, and Monitoring Recommendations* (Battelle 2004) also recognizes Little Manzanita Bay as a separate bay from “Big” Manzanita Bay.

It is completely false that most of the homes on Little Manzanita Bay have private docks that provide access to navigable water during all tide levels. There are only 2 docks in Little Manzanita Bay – the applicants dock and a 93-ft dock to the north (“Sandy’s dock”). Equating the 30 docks on Manzanita Bay to what is currently on Little Manzanita Bay is grossly misleading. Why not just say the applicants are proposing a dock in Puget Sound? The project area is Little Manzanita Bay **not** Manzanita Bay! The proposed dock “**will** constitute a grant of special privilege not enjoyed by other properties in the area.”

I also disagree with the applicants’ assertion that the proposed 240-ft dock would “minimize, if not completely avoid, negative impacts to the substrate.” They fail to address the prop wash from 2 ≤50ft boats going in and out of Little Manzanita Bay. Prop wash and associated scouring or disturbance of the bottom may have significant and cumulative long-term impacts on benthic organisms, including shellfish, submerged aquatic vegetation, and finfish.

Pgs 2-3, Items G.4.a.vi and iii: The public interest will suffer no substantial detrimental effect. The applicants state, “...an elevated pier...will improve nearshort (sic) navigability for kayaks, paddleboards, canoes and other small watercraft over what exists now” and “The project will improve navigation...” How can one make such statements with a straight face? They are stating that the construction of a 240-ft dock in a small bay that currently does not have a dock extending more than 80 ft into the nearshore environment will improve navigation!? Do the applicants know what the term navigability is and how such a large dock will actually increase navigation hazards in Little Manzanita Bay? Lastly, what about aesthetic or viewshed impacts? The applicants fail to assess impacts to the public interest regarding these important community values.

Pg 3, Item c: The applicant's entire argument for this criterion is false. They state, "It is not likely that any other waterfront properties in the area would request variances because most of them already have docks providing access to navigable water." This is patently untrue because the applicants are equating Manzanita Bay with Little Manzanita Bay. They are not the same waterbody and one cannot use the existing docks on Manzanita Bay to support a proposed dock in Little Manzanita Bay. In addition, and as stated previously, the applicants are proposing a dock because of "inadequate water depth" at their property. So why couldn't property owners to the south also request a variance and construct a dock of adequate length to reach deeper water? In fact, the granting of a variance to the Wysong-Ziemba property would create a precedent and potentially allow for additional longer docks to be constructed within Little Manzanita Bay.

3. SEPA Checklist

Pg 2, Item A.8: Where is the Army Corps of Engineers permit and mitigation plan? Where is the supporting information for a Clean Water Act permit or a Rivers and Harbors Act permit? The "mitigation plan" that is currently in the applicants' permit package is grossly inadequate and insufficient to support the proposed project.

Pg 3, Item A.10. Applicants state that ESA section 7 consultation with NOAA and USFWS has been completed. That concurrence letter should be part of the application package. Please provide that concurrence letter ASAP so that the public can review all relevant and applicable materials for the proposed action. The Abbreviated Biological Evaluation provided in the applicants' package is incomplete and inadequate and comments will be provided below.

Pg 3, Item A.11. Please provide copy of agreement with the Suquamish Tribe regarding the removal of the Ziemba mooring buoy.

Pg 3, Item A.12. While the terrestrial location is fine, it should be explicitly stated that the project will occur in the waters and nearshore environment of Little Manzanita Bay.

While this is more of a comment on the organization of the SEPA checklist and applicants' response to the various items, Item B.1.e should be in the Water section not Earth.

Pg 4, Item B.1.e. Text states that steel pilings would cover 20 ft². In the Project Narrative (pg 2, 2nd bullet) the area is stated as 13.8 ft². However, if one does the math, the area covered by the 24, 10-inch steel piles equals 12.98 ft². Another instance of inconsistency and contradiction in an application package. Simply shows attention to detail and due diligence by both the applicants and the consultant preparing the package.

Pg 4, Item B1.g. Text states that existing dock "includes 601 square feet of impervious surface." The Project Narrative states that the existing dock is 496 ft². Which is it? Another example of contradictory information or it is not clearly explained what is being presented with respect to area of the existing dock.

Pg 5, Item 3.a.1. The project is located on the **eastern**, not western, shore of **Little** Manzanita Bay, not Manzanita Bay. Another instance of lack of attention to detail with respect to basic information about the project and its location.

Pg 5, Item 3.a.2. The quarry spalls are not in the water.

Pg 8, Item 5.a. What is the relevance of stating that bald eagles have been observed in Hidden Cove? The project area is not within Hidden Cove. Another instance of sloppy preparation of the application package.

Pg 8, Item 5.b. The bald eagle has not been a federally listed species since 2007! I pointed this out in my comments on the 2016 application and it is obvious that the consultant and applicants ignored or did not read the previous comments. It is highly unlikely that marbled murrelets would be found in Little Manzanita Bay. I am a USFWS-certified marbled murrelet observer and have prepared numerous Biological Assessments to support ESA section 7 consultations, so I am very familiar with the distribution and habitat requirements of marbled murrelets. Little Manzanita Bay is too shallow to support feeding murrelets. The

applicants only state that “several species of juvenile salmon may use the nearshore waters.” There are a number of federally listed salmon species that may occur within the project area and the application needs to call these species out, not simply state that several species of salmon may occur. Three additional instances showing lack of knowledge and experience with the project area and potential occurrence of listed species within the project area.

In addition, the application package should recognize that Little Manzanita Bay is designated critical habitat for Puget Sound chinook salmon, Puget Sound rockfish, and Southern Resident Killer Whale. While the SEPA checklist does ask for a list of threatened and endangered species and does not explicitly ask for critical habitat, it goes without saying that any federally listed species or critical habitat within the project area should be acknowledged. I pointed out the presence of designated critical habitat in my 2016 comments, but again they were obviously ignored or not read by the applicants or the consultant preparing the application package.

Pg 8, Item 5.c. What species of juvenile salmonids use the marine nearshore areas? The statement that the site “could” be used by migratory waterfowl is incorrect. Little Manzanita Bay **is used** by migratory waterfowl. The area is also used by numerous forage fish species such as sand lance, herring, and surf smelt. Manzanita Creek is used by cutthroat trout and chum and coho salmon (Battelle 2004).

Pg 8, Item 5.e. Raccoons are not an invasive species! They are native and not considered invasive by the Washington Department of Fish and Wildlife. There is no such species as a “field rat” on Bainbridge Island. Field rats are only found in SE Asia, Australia and India. Technically, there are 2 species of rats on BI: roof or black rat (*Rattus rattus*) and Norway or brown rat (*Rattus norvegicus*). Continuing examples of a poorly prepared application package (Spaulding, R. 2006. Mammals of Bainbridge Island. Invited Presentation to the 6th Bainbridge Island Environmental Conference, IslandWood. “Wildlife and Their Island Habitat.” September 30, 2006.

Pg 10, Item 7.b.2. Noise. It is very surprising that there is no mention of pile driving, by far the largest contributor to the noise environment for this proposed action. To simply state that noise sources would only be from a tugboat, barge mounted crane, and hand power tools is grossly misleading and inaccurate. The applicants/consultant should provide further information regarding the type of pile driving that would occur (i.e., impact or vibratory), whether proofing of piles is required, how long pile driving would occur, and the estimated received noise levels associated with pile driving for the homes along the shoreline of Little Manzanita Bay. The SEPA checklist specifically requests the “levels of noise” from the project. This is a very significant oversight and again points to a very poorly prepared application without any thought or attention to the important issues associated with the proposed action.

Pg 10, Item 7.b.3. Applicants state that construction would occur during the time of year when salmonids are least likely to be present. Application needs to provide the specific work windows as outlined in the US Army Corps of Engineers and WAC 220-660-330 regarding authorized work windows for projects in marine waters.

Pg 12, Item 10.a. What is tallest height of proposed structures? Applicants state that the pier will be 4 ft higher than the existing bulkhead. Why are they referencing the height of the dock/pier in relation to the bulkhead? What about the height of the proposed boat lifts? Will they be taller than the main dock itself? This section is incomplete.

Pg 12, Item 10.b. The statemen from the applicants that, “The views from adjacent properties will not be altered or obstructed. The end of the structure may be visible from the residential dwellings but will not impact the water views.” This is patently untrue and clearly illustrates that the applicants do not have any understanding as to how their monstrous 240-ft dock will impact their neighbor’s viewshed. It is incredulous that the applicants can state, “end of the structure may be visible from the residential dwellings.” The entire dock will be visible from most residences along Little Manzanita Bay. The proposed

dock **will impact** the water views from all residences on the water and those that look down upon Little Manzanita Bay. The dock will also significantly impact the viewshed for islanders and tourists that drive, bike, or walk along Manzanita Dr. Little Manzanita Bay is one of the last, if not the last, bay around Bainbridge Island that is not cluttered with docks, especially large docks like the proposed 240 ft dock.

Pg 12, Item 11.b. Applicants state that light from the proposed project would not interfere with views. This again is untrue. Currently there are no lights on Little Manzanita Bay and proposed dock will add lighting that will intrude upon the existing environment and viewshed at night.

4. Abbreviated Biological Evaluation

Pg 2, Item 6. Document states that quarry spalls will be removed from a 203 ft x 24 ft area. While obviously a typo, the dimensions should be 23 ft x 24 ft. Another instance of sloppy document preparation; no attention to detail or review of application by applicants or consultant prior to submitting to the COBI.

Pgs 5-6, Items 1a, 2b, and 4a. Document lists a proposed total pier/dock length of 248 ft (140 ft [pier] + 60 ft [float] + 48 ft [ramp]). All other application materials refer to a pier/dock length of 240 ft. What is the true length of the proposed dock?

Pg 9, Item 8. This has to be a mistake as why are the applicants proposing the use of treated wood (ACZA)??? First, the proposal states that the pier will be steel grating along with steel piles. Where is the treated wood being used? In addition, even if you were going to use ACZA, it states explicitly in the ABE that ACZA piles may not be used in forage fish spawning habitat. The project area is in forage fish spawning habitat (Battelle 2004). But I believe this is another example of sloppy preparation of documents by an inexperienced or inattentive preparer.

Pg 9, Item 9. The *Draft Agreement Regarding Covenants, Conditions, Restrictions, and Easements for the Use, Maintenance and Preservation of Dock* states that boats up to 50-ft in length may be moored at the proposed dock. This should be made clear in the ABE in this section. Just listing the 30 ft and 32 ft boats does not provide a reviewer with the full description of the proposed uses of the dock. The ABE should provide all the information for current and proposed potential future uses given it will be assessing impacts based upon potential future use.

Pg 10, Item 12. Forage Fish Habitat. Applicant acknowledges that forage fish habitat is within the project area. However, the ABE specifically states, “you must show the extent of this habitat on a project drawing.” This information is not provided so ABE is incomplete.

Pg 12, Item 17. Mitigation. ABE states, “Applicant must complete the mitigation section of this document and provide either a Mitigation Plan, Bank Use Plan or In-lieu Fee Program Use Plan, as applicable.” The applicants have checked that they will implement but have not provided a Mitigation Plan.

Pgs 12-13, Item 19. Lighting. ABE states, “Artificial lighting of the marine environment should be minimized to the extent possible. If lighting is proposed, it should be included on the project drawings and will be included in the review process.” Project drawings depicting proposed lighting have not been provided with the application.

Pgs 14-17, Compensatory Mitigation. The required information to support mitigation has not been provided. Specifically, “project drawings should include vegetation zones in relation to existing and proposed structures” (pg 15). Table 2, Mitigation Calculations, is grossly incomplete and applicant does not provide supporting documentation. Where did the 47.91 MP value come from on pg 17?

5. Wysong/Ziemba Plan/Elevation View, Mitigation Plan

This 1-pg “plan” is grossly inadequate and does not even show the proposed structure. See the comments on the ABE and the items that need to be included on plan drawings and within a mitigation plan. I assume

the Overland Addition has been deleted from the project. Please prepare all documents for public and agency review with the most current and consistent information across documents.

6. Bathymetric Survey

Per the September 13, 2016 letter from Heather Wright to Leann McDonald re the Wysong/Ziemba Dock Replacement Permit PLN50280 SSDP, “the SMP prohibits overwater structures at locations where critical physical limitations exist, such as shallow sloping tidelands with gradients of 3% or less.” Based on the bathymetric information provided in the application materials, while the entire length of the proposed dock by have a gradient of 4.2%, there are significant portion of the tidelands underlying the proposed dock that are <3%. My interpretation of the SMP is that overwater structures are prohibited over tideland gradients of 3% or less, and that would include that portion of the proposed dock that falls within this <3% gradient. You can propose to build a portion of the proposed dock in the area that is >3% but the applicants are prohibited from building in areas <3%.

Summary

In summary, the proposed project and supporting materials are insufficient and incomplete, and do not support the Shoreline Substantial Development Permit and a Shoreline Variance. The number of errors, incomplete documents, sloppy and inaccurate descriptions or calculations shows that the applicants and consultant that prepared the 2019 application materials did not take this project planning process seriously and did not invest the effort and attention to detail that it warrants. Based on the sloppiness of the provided materials, I have no confidence that the applicants will do anything that they propose on paper, and in some instances it is confusing as to what they are really proposing. Documents within the application often contradict each other or present wrong or misleading information. It seems apparent that the applicants and/or the consultant who prepared the 2019 application did not read my previous comments on the 2016 application. This leads me to believe that the applicants really do not care about providing an accurate and complete application to support their proposed action, but rather they feel they can exert the minimum effort necessary and be granted their permit and variance.

This proposed dock is totally unacceptable given its location in Little Manzanita Bay. The argument that this dock will simply be one of many is without merit and is totally misguided with respect to the current conditions of the project area. As stated many times previously, the project is in Little Manzanita Bay not Manzanita Bay. The size and use of the proposed dock are inappropriate and out of context with the existing environment and public use of Little Manzanita Bay. The applicants can currently use their property and operate their boats with their existing mooring buoy, as do all the other residents of Little Manzanita Bay. To allow a 240-ft monstrous dock to be constructed for the recreation of 2 homes (and an increase of only 30% more use) at the significant detriment to all other residents around Little Manzanita Bay should not be allowed or permitted.

I adamantly oppose the project and request that the Shoreline Substantial Development Permit and Shoreline Variance be denied.

Thank you,



Rick Spaulding
6765 NE Day Rd, Bainbridge Island