K'Allen Specht

My name is K"Allen Specht. I was just informed that unopened public rights-of-way will not be included in this inventory effort. I ask Ecology to reconsider that exclusion. The existing rule expressly includes potential shoreline access public sites including public rights of way.

I have two technical corrections to the proposed rules and followed by 1 narrow request. First, WAC 173-26-231(2), page 127, retains a subsection (g) even though the text following it is struck out.

Second, WAC 173-26-231(4) C triple iv, page 141, points to subsection B4, or iv, for the erosion control preference hierarchy, but B4 addresses waterward placement and nature-based stabilization. The correct reference is BB.

My main comment concerns Dayton St. in Snohomish County, a public shoreline asset that is almost invisible. Dayton St. is platted, unopened public right-of-way extending to the Port Susan Tidelands. It has not been vacated. I have not found it identified in public shoreline access inventories. County right-of-way research stated Hillman Place and Dayton St. go all the way to the tidelands.

Dayton St. Dayton needs neither pavement nor signage to remain a public right-of-way. Its potential to provide shoreline access exists whether or not it is improved. Ecology"s existing WAC 173-26-201(3) (C)(VI) already requires shoreline inventories to identify "existing and potential shoreline access sites, including public rights-of way-and utility corridors." Yet, Soundview Dr. was removed from Ecology"s public-facing Coastal Atlas after private complaint, while Dayton St. remains missing from the inventories I could locate. The existing rule recognizes these public shoreline access assets, but they are still being overlooked or removed.

Proposed WAC 173-26-24, 246 D requires Ecology to make this inventory publicly available. When a public street end is omitted, that admission carries into the information available. The public can influence and can influence future shoreline planning decisions. I propose explicitly including potential access sites so the unopened or unimproved public rights of way are not excluded.

The location of site quote or one option could be the location of sites that provide or could provide public access to the shoreline, such as parks, public piers, street ends, including unopened or unimproved public rights-of-ways and boat launches. And to prevent unjustified removals.

Add immediately after WAC 173-26-246 BVI removal and identified a public shoreline access site from inventory requires a demonstrated, compelling reason an unimproved public street end should not become an unknown public street end.

Thank you, guys, very much for your time. I do appreciate it and hope that you reconsider including unopened platted right-of-ways in the inventory as it is a potential public access site as already reported and I would like to see that. Thank you.