



Clallam County Parks, Fair & Facilities Department

223 E. Fourth St., Suite 7
Port Angeles, WA 98362

July 6, 2023

To: Clallam County Park Board

The bi-monthly meeting of the Clallam County Park and Recreation Advisory Board will be held in the Board of Commissioners Meeting Room in the Main Courthouse Building on **Monday, July 10, 2023, at 5:30 p.m.**

*****Attention*****

Park and Recreation Advisory Board meetings will also be available virtually at:

If you would like to participate in the meeting via Zoom audio only, call 253-215-8782 and use meeting ID: **859 4362 6413** and passcode: **12345**

If you would like to participate in the meeting via Zoom video conference, visit www.zoom.com and use meeting ID: **859 4362 6413** and passcode: **12345**

This meeting can be viewed on a live stream at this link: [Live & Archived Meetings Online | Clallam County, WA \(clallamcountywa.gov\)](#)

Public comment can be directed to the Parks, Fair & Facilities Administrative Operations Coordinator at 360-565-2659 or via email at Melissa.Earley@clallamcountywa.gov

AGENDA

- A. Call to Order
- B. Roll Call
- C. Determination of Quorum
- D. Disposition of Minutes – May 2, 2023, Regular Meeting
- E. Correspondence Received
 - 1. Five letters regarding support for horseback riding at Dungeness Recreation Area
- F. Unfinished Business
 - 1. Horseback Riding at Dungeness Recreation Area
- G. Committee Reports
 - 1. Parks master Plan Update – Subcommittee Report

Direct: 360-565-2659
Main Office: 360-417-2291
Melissa.Earley@clallamcountywa.gov

H. Staff Reports

1. Forestry Master Plan for Robin Hill Farm County Park – Onsite meeting with Department of Natural Resources and Washington State University Cooperative Extension Foresters

I. New Business

1. Proposal to Establish Cascadia Marine Trail at Salt Creek Recreation Area (10 minute Power Point Presentation and 15 minute Discussion)

J. Public Comments

K. Adjournment



**Peninsula Chapter
Back Country Horsemen of Washington
PO Box 451, Carlsborg, WA 98324**

To: John Graham, Park Manager, Dungeness Recreation Area
Donald Crawford, Parks Director, Clallam County

RE: Proposal to remove horseback riding at Dungeness Recreation Area

5/11/2023

We realize that the Parks Department is looking at updating their recreation plan for the Dungeness Recreation Area, and are considering removing horses from being allowed on the only trail open to horseback riding in the DRA. We ask that you reconsider this proposal and go with the Feb 2018 Master Plan map (attached).

Peninsula Chapter BCHW has long been involved in advocating for horseback riding trails on the Olympic Peninsula, and we back this up with trail maintenance. We realize that it takes extra effort to support allowing horses on trails shared with walkers and bicyclists, particularly those not use to being around horses. The incident that closed the USFWS trail in the Dungeness National Refuge was one we very much were familiar with. It was not based on an encounter with horses but by being in the proximity of 3 horses being walked appropriately up from the beach. USFWS was already updating their CCP plan with the intent of eliminating horses from this last remaining stretch of trail on USFWS property open to them, and the only way to get down to the beach where they could ride (though they couldn't ride out the spit to the lighthouse anymore). By eliminating this short but wide ramp trail, they effectively cut horses off from riding the beach toward Port Angeles. This also made the 1.5 mile segment in the County DRA more of a short stretch deadend trail. However, we were led to believe that the USFWS would help us establish an alternate route to the beach, which didn't happen. Our efforts to keep the trail access included our national organization, Back Country Horsemen of America, hiring outside counsel to file national comments (position document attached).

The reasons USFWS gave for wanting horses off that access ramp are somewhat the same Mr. Cushman has given, including the fact that we could ride elsewhere at Robin Hill Park, State Park lands at Miller Peninsula, and also, the County Dungeness Recreation Area. Miller Peninsula is currently the subject of a Master Plan development to site campgrounds on the State Parks property, and in the discussions there, it was also mentioned that horseback riding can occur nearby at Robin Hill and the paved Olympic Discovery Trail. Once campgrounds are sited at Miller, the users will likely be the same users that Mr. Cushman is dealing with. What many seem to agree is that there should be more trail opportunities for horses up in the hills on Forest Service and Dept of Natural Resources lands, of which there are few, particularly with parking. After 20 years of trying, no new trails have been built on that higher foothills landscape other than a road decommissioning for the Pacific Northwest National Scenic Trail, which has yet to be laid out. The general sentiment across agencies seems to be that horseback riders have plenty of opportunities – just not here.

We have hoped that a Day Use Alternative would be added to the Miller Peninsula Development options under SEPA, but that has not yet materialized. All current alternatives under consideration include campgrounds to be used by visitors similar to those that visit the Dungeness Recreation Area.

For horseback riders, this really comes down to being excluded and told to go somewhere else. We used to ride out to the lighthouse, but then we were accused of scaring the birds. As far as we know, there were no reported incidents in the many years that horseback riding was allowed on the spit.

We horseback riders try to promote safe shared trail use through our programs. We perform thousands of hours of trail work each year. Peninsula Chapter's latest RCO grant rated #2 in the Recreation Trails Program (RTP). Clallam County is one of the agencies that has signed onto supporting Peninsula Chapter BCHW with this grant. We just ask to be allowed to ride on trails designated for horses, and not have them perpetually taken away from us. Let's find a way to make this work with better signage, fencing, and other considerations.

Please keep the Dungeness Recreation Area Trail open to horseback riding.

Thank you for your time,

Theresa Percy, President,
Peninsula Chapter BCHW
PO Box 451, Carlsborg, WA 98324

peninsulabchwchapter@gmail.com



(703) 535-5565
(703) 997-1330 fax
kevin@gardenlawfirm.com

January 21, 2013

VIA EMAIL (w/ receipt confirmation)

U.S. Fish and Wildlife Service
Washington Maritime National Wildlife Refuge Complex
715 Holgerson Road
Sequim, WA 98382
FWIPlanningComments@fws.gov

Re: *Comments on Dungeness National Wildlife Refuge Draft Comprehensive
Conservation Plan and Environmental Assessment*

Dear Sir/Madam:

I am writing on behalf of the Back Country Horsemen of Washington ("BCHW") to provide BCHW's comments on the Dungeness National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Assessment dated November 2012 ("Draft CCP/EA"). The Service's proposal to ban horseback riding in the Dungeness NWR due to the perceived risk it creates for pedestrians is a very, very significant determination that not only excludes equestrians from the Dungeness NWR but may also set a far-reaching but invalid precedent for public trails nationwide. Accordingly, BCHW's members as well as all equestrians have a lot at stake in this process.

BCHW very much appreciates the opportunity to provide these comments on the Draft CCP/EA and looks forward to fully participating in this crucial process for determining how the Dungeness NWR shall be managed for the next 15 years and how trails on our public lands can be safely shared by different user groups.

A. Introduction

BCHW's concerns with the Draft CCP/EA arise primarily from the draconian proposal to eliminate horseback riding from the Dungeness NWR. As discussed in more detail below, the Service's unprecedented proposal unfairly and improperly concludes that horseback riding is an unacceptable use of the Refuge due to a single incident in the 98 years the Refuge has existed. However, based on accounts of this single incident by people who were present, the unfortunate injury was not due to "user conflict" but instead was due to the failure of the particular visitors involved to follow safe trail etiquette.¹ Because injuries to visitors will happen whenever trails are not used safely, regardless of whether many or only one user group is present, it is wrong to single out equestrians in general as the cause of this particular incident. Furthermore, it is misguided to conclude that visitors can be made safe by eliminating different user groups because safety comes from safe conduct, and safe conduct is created by educating visitors. It is important to point out that the incident which led to the proposed ban on horseback riding was not caused by "user conflict" or the mere presence of horses, but instead by unsafe conduct. This is a key distinction that BCHW believes the Service failed to recognize and which should be addressed in the proposed alternatives.

As set out below, there are several alternatives which would reduce the risk to visitors while allowing horseback riding to continue, none of which were considered by the Service. The

¹"User conflict" occurs when either of two user groups, both of which are acting in a safe and appropriate manner, cannot safely use an area or cannot enjoy their experience due to the mere presence of the other group. This situation is not present at Dungeness NWR.

Service's failure to consider these reasonable alternatives is a violation of the National Environmental Policy Act ("NEPA"), 42 U.S.C. §§ 4321-4347.²

B. The Service failed to evaluate all reasonable alternatives by only considering alternatives that banned equestrians.

The Draft CCP/EA states that the "Service has developed and examined a total of three alternatives for future management of Dungeness NWR [] pursuant to the National Environmental Policy Act of 1969 (NEPA), as amended (42 U.S.C. 4321-4347)." Draft CCP/EA at 1-2. However, a review of those alternatives demonstrates that the Service failed to consider all reasonable alternatives. The only alternative allowing horseback use is the "No Action" alternative (or maintaining the "status quo") which is an alternative required by law to serve as a benchmark against which to measure the other alternatives. Therefore, all of the alternatives actually developed by the Service to address the specific issues raised proposed excluding equestrians. In other words, by not developing any alternatives tailored to this situation that provided for horseback riding, the Service had already made up its mind that it would prohibit horseback riding from the Refuge before it issued its draft alternatives.

A reasonable alternative which was not considered but would address the safety concerns identified by the Service and still allow horseback riding would be to install signage to educate all users, including pedestrians, on trail safety. While the Draft CCP/EA proposes educating visitors on the wildlife and history of the Dungeness NWR, it never proposes educating visitors on safe trail conduct. This task could easily be accomplished. Currently, there are no signs

² The trail section at issue is believed to have been originally built by tribal and local equestrians for the specific purpose of allowing equestrians to access the beach and Spit. It is sadly ironic that the Service is now proposing to exclude equestrians from a trail equestrians made because other user groups now use that trail.

whatsoever informing pedestrians that they may encounter horses on the short section of trail at issue where the accident occurred. Nor are there any signs educating visitors as to proper and safe trail conduct, such as stopping to allow a horse to pass by and heeding reasonable requests of horseback riders to ensure everyone's safety. In fact, there are no safety or shared use signs at all. Based on anecdotal accounts of the incident this past May, this signage (and a willingness to comply with it) may have prevented the incident from occurring.³

For example, a large sign could be put at the top and the bottom of the hill noting that the route is shared with horseback riders, horseback riders are required to dismount and proceed single-file and pedestrians should step to the opposite side of the trail and stop to allow horses to pass.⁴ The signs could also include the following guidelines which are published by the Department of Natural Resources for the State of Wisconsin to educate its trail users:

- All users yield to horseback riders.
- When encountering a horse, speak in a calm, pleasant tone so the horse hears a human voice. Do not hide.
- The rider knows the horse the best. Expect the rider to advise you, not as a lack of courtesy, but rather with knowledge of the horse's temperament.

See <http://dnr.wi.gov/files/pdf/pubs/pr/pr0472.pdf>. BCHW would be happy to assist the Service with the sign design. Providing visitors with this knowledge of proper trail

³ Attached hereto is a copy of the Incident Report related to the incident prepared by the Service. While information obtained by BCHW differs somewhat from this account, the Incident Report indicates that the pedestrian did not stop to allow the horses to safely pass even though the equestrians requested them to do so.

⁴ Apparently the equestrians involved in the May 2012 incident had dismounted and were leading their horses single file up the trail at the time of the incident. The equestrians reportedly requested that the pedestrians stop while the horses passed by because of one of the horse's temperament, but this request was apparently ignored. If accurate, these facts only further show that the incident was not caused by a user conflict, but by a failure to follow safe trail conduct.

etiquette would contribute to preventing situations that can be misconstrued as “user conflicts” from ever occurring in the first place.

To the extent additional safety measures were desired, a railing could be installed on the trail that allowed access for the Service’s UTV along with the improved signage that educates all visitors on how to act safely on the trail.⁵ While the Draft CCP/EA identifies alternatives that were considered but rejected as unreasonable, this alternative was not identified in that section. Draft CCP/EA at 2.2. To the extent that this alternative, or anything similar, was internally considered by the Service but rejected, the Service should have notified the public of that alternative and why it was rejected so that the public could also comment on the decision to reject it.

The Service stated that the only reason it was proposing to eliminate horseback riding was due to the unacceptable safety risks created by potential user conflicts. However, the perceived safety risks could readily be reduced to clearly acceptable levels under this alternative. The rail does not necessarily have to be in the middle of the trail, but could be offset so that the Service’s UTV and horses could travel on one side of the trail.⁶ In addition, by installing the rail in sections with a 4 foot space between sections, a horse could be brought to the other side of the rail if there was an oncoming UTV or

⁵ The Service summarily stated that “there are no reasonable methods of guarding or physical separation,” but provided no basis for this conclusion. *See* Draft CCP/EA at A-10. As a result, the public has been prevented from providing any comments on the analysis actually conducted by the Service to reach this conclusion because that analysis was never disclosed.

⁶ If the Service’s current UTV is excessively wide, the Service could readily sell its UTV and purchase a narrower trail vehicle. There are many such vehicles available which have a narrow width but can accomplish any tasks the Service would complete with its current UTV. At a minimum, if the decision comes down to banning horseback riding because a rail cannot be installed due to the size of Service’s current UTV, the Service should get a new UTV.

another horse. However, these incidents would nonetheless be very infrequent because, as the Draft CCP/EA points out, there is not an excessive amount of equestrians and to the extent there is any significant traffic flow, it usually is at the times the tide is coming in or out and typically in one direction (*i.e.*, in when the tide is going out, out when the tide is coming in).

An additional alternative which was not discussed in the draft CCP/EA is to explore securing an easement on the privately owned parcels to the east of the Dungeness NWR near the ocean (the Wood parcels).⁷ If access could be obtained on these parcels, the horse trail traffic could be rerouted to a separate trail in this drainage. BCHW would certainly volunteer to construct and maintain the trail through an appropriate Memorandum of Understanding.

C. The Service's conclusion that equestrians create an unreasonable risk of harm to pedestrians is unsupported and improperly blames equestrians for the unsafe actions of pedestrians.

In the Draft CCP/EA, the Service states that it made an "Appropriate Use Finding" and has concluded that horseback riding is not appropriate within the Dungeness NWR "due to safety concerns and user conflicts." Draft CCP/EA at 2-8; Draft CCP/EA at 2-14 (Horseback riding is "[n]ot appropriate, therefore not allowed").⁸ However, this finding is incorrect because it is

⁷ The Draft CCP/EA summarily states that "there are no other access alternatives." Draft CCP/EA at A-10. Similar to the summary statement regarding separating flow on the trail, as a result, the public has been prevented from providing any comments on the analysis actually conducted by the Service to reach this conclusion because that analysis was never disclosed.

⁸ While the Service has concluded that horseback riding is not appropriate within the Dungeness NWR due to user conflicts, other than the single incident in May 2012, the Service does not discuss any history of user conflicts at Dungeness NWR. As a result, the term "user conflicts" appears to be redundant of the safety concerns raised by the Service. See Draft CCP/EA at A-9 (stating that a pedestrian was harmed due to a "conflict" with an equestrian).

based on the erroneous determination that the mere presence of equestrians creates an unreasonable level of risk and that there is no way this risk can be reduced to acceptable levels

Under the Service's policy, in order to be viewed as an "inappropriate" activity in a Refuge, the use must do one of two things: either create an unreasonable level of risk to visitors or require refuge staff to take unusual safety precautions. As set out in the Appropriate Refuge Uses Policy (2006)(603 FW 1 at 1.11(A)(3)(d)):

If the proposed use creates an unreasonable level of risk to visitors or refuge staff, or if the use requires refuge staff to take unusual safety precautions to assure the safety of the public or other refuge staff, the use is not appropriate.

Up until May of 2012, the Service viewed horseback riding as an appropriate activity at Dungeness NWR. Then, based on one incident in the entire 98-year history of Dungeness NWR which occurred in May 2012, the Service proposed to ban equestrians from the Refuge because the Service determined that equestrian activity creates an unreasonable risk to pedestrians' safety. This determination is not correct. As discussed below and based on available accounts, the injury in May 2012, while extremely unfortunate, was due to unsafe trail activity which can occur when *any* visitors are present, regardless of which group. Moreover, the incident did not in any way demonstrate that the Service had somehow underestimated the level of risk which was present prior to May 2012. Moreover, the alternatives proposed today would enhance proper trail etiquette which would even further reduce the risk of injury to any visitor.

Based on information available to BCHW, the incident which led to the proposed ban on equestrians appears to have been caused by the pedestrians' failure to heed safe trail practices, even after the equestrian specifically requested the pedestrians to stop while he calmed his horse. The resulting injury occurred after the pedestrians failed to comply with this appropriate and

reasonable request, which shows that the resulting injury was not due to safety problems caused by horses. Instead, it was caused by safety problems due to trail users who do not follow safe practices and endanger themselves and others.

Moreover, equestrians and pedestrians safely co-exist on trails all over the country, including many hillside trails in our National Parks and National Forests that are much, much more narrow than the trail segment at issue here. Neither the National Park Service nor Forest Service have ever banned equestrians from a trail because of any alleged safety issue raised by the presence of equestrians and pedestrians on narrow trails. Instead, they install guidelines for safe trail use. These guidelines obviously do not constitute unusual safety precautions. The Service's decision to ban equestrians in a similar situation is thus entirely unprecedented for a federal agency. Furthermore, the fact that the Service's decision was made before it even made an effort to launch a campaign to educate pedestrians at Dungeness NWR on proper trail behavior and etiquette is perplexing.

D. Any alternative that bans equestrians from the Refuge is illogical and unfair.

There are additional reasons why the Service's decision to ban horseback riding is illogical and unfair. As the Service makes clear, impacts on wildlife are the most important concern in a National Wildlife Refuge. Draft CCP/EA at 1-7 ("The needs of wildlife and their habitats come first on refuges, in contrast to other public lands that are managed for multiple uses"). However, the Service's own analysis shows that equestrians have less impact on wildlife *than any other user group*, including pedestrians.

Only one study identified disturbance tolerance of waterfowl to horseback riders and found that horseback riders could approach geese up to a distance of 150 feet. This is compared to suggested hiking trail distances of 250 feet (Miller et al. 1998) and boat buffers ranging from 250 to 900 feet (depending on type of boat, whether motorized,

and species impacted; Burger et al. 1999). The 150-foot approach distance offered by Owen (1973) is consistent with observations suggesting that horseback wildlife observers can approach wildlife at closer distances than through other form of travel. Many wildlife species appear to be habituated to livestock and thus are less likely to flee when approached through this method.

2007 USFWS Hanford Draft CCP.⁹ Given that (a) wildlife comes first and (b) the Service's analysis shows that visitors on horseback have less impact on wildlife than any other user group, banning equestrians for the sole purpose of facilitating the experience of a more disruptive user group makes no sense. While equestrians are not asking the Service to exclude any user group, the truth is that, if wildlife comes first, then a resolution of any perceived "user conflicts" between horseback riding and pedestrians should be focused on pedestrians. However, as discussed above, all of the alternatives the Service proposed to address the perceived user conflicts (other than the legally-mandated "No Action" alternative" which was not developed by the Service to address the issues) banned equestrians. In truth, equestrian users should be the preferred visitors.

The Service also engages in circular reasoning to conclude that horseback riding is not necessary for wildlife viewing. Draft CCP/EA at A-9 ("horseback riding is an existing use on the Dungeness NWR that can facilitate wildlife observation, but is not necessary to achieve it"). Apparently, the Service has concluded that, because visitors can view wildlife by walking, it is not necessary for them to use horses. However, under that same logic, walking is not necessary to view wildlife because visitors can use horses. As long as there are several ways to view wildlife, any one of those ways can be picked out and viewed as unnecessary. Horseback riding is no more or less necessary to wildlife observation than is walking.

⁹ These comments can also be found in USFWS Malheur NWR Draft CCP under Compatibility Determinations. The Owen study is from Owen, M. 1973, *The Management of Grassland Areas For Wintering Geese* (Wildfowl 24:123-130).

The Service's conclusion to exclude horseback riding because of perceived conflicts with pedestrians also appears to be based on its unstated presumption that walking is the *preferable* way to view wildlife at the Refuge. However, this presumption makes no sense given that walking causes *more* disturbance to wildlife than horseback riding. As noted above, given that wildlife concerns are the highest priority, horseback riding should in fact be the preferable way of visiting the Dungeness NWR and should be actively encouraged.

The Service appears to favor pedestrians over horseback riders even though walkers cause more of a disturbance than equestrians simply because there are more pedestrians. *See* A-10 ("There is orders of magnitude difference between the number of pedestrians versus the number on horseback visiting the Refuge"). However, determining the preferred user group at a Refuge should not be based simply on which group has the most users but instead should take into account the impact of that user group. While walking and horseback riding should both be viewed as acceptable uses of the Refuge, horseback riding should be encouraged given its lesser impact.

E. The Service incorrectly stated in their Draft CCP/EA Appropriate Use analysis that walking, hiking, nature activities and horseback riding are projected to increase at high growth rates.

The Service incorrectly stated in their Draft CCP/EA Appropriate Use analysis that "walking, hiking, nature activities (i.e. wildlife observation and photography), horseback riding are projected to increase at high growth rates (IAC 2003)." Draft CCP/EA at A-10. The source for this information is set forth in Table 5-7 (IAC 2003) (Draft CCP/EA 5-30) and estimates that between 2013-2023, as to the type of users at Dungeness NWR, pedestrians will increase by 11%, hikers will increase by 10%, nature activities will increase by 14%, and equestrian

activities will increase by 3%. According to Draft CCP/EA at A-10, there are around 80,000 non-horse visitors and 164 horse visits per year now. However, a 3% projected increase equestrians means the alleged “high growth rate” for horse visits will merely be 5 additional horse visits per year after 10 years, which from a management and use perspective is an insignificant increase. The “high growth rate” for pedestrians is 9-10 thousand additional pedestrian visits per year. This data demonstrates that any projection in increased future conflicts is driven by significant increases by pedestrians, which, if correct, would show that the Service has a pedestrian management problem, not a horse one, and that the Service is taking a view of their own data in their Appropriate Use analysis in order to justify eliminating horses.

F. Equestrians should have access to Outer-Zone 2 and Zone 3 (the outer Spit zones) as well as existing use and schedules for Zone 1 and the Upland Zone (all can be on the same allowance schedule).

In addition to the issues raised above, BCHW believes that there is no basis to continue denying equestrians’ access to the Spit (outer Zone 2 as well as Zone 3) during the winter months given the findings in the 1973 Owen Study that is recognized by the Service. Visting this area had been a traditional habit of equestrians. For example, Local Back Country Horsemen at one time held an annual ride out to the Lighthouse for a picnic. Jamestown tribal members also visited the Lighthouse as in these published recollections by Tribal Council Vice-Chair Liz Mueller:

“Thinking about horses, she recalls packing a lunch and riding out Dungeness Spit to the lighthouse, knowing where all of the burial grounds were along the way.

—They have a sign-in book upstairs in the lighthouse. My name is in there – I think in 1953. she (Mueller) said.”¹⁰

¹⁰ Jamestown S’Klallam Tribe Newsletter, Volume 32 Issue 7 (July 2011) at page 10.

No adequate explanation has ever been made as to why horseback riding has been disallowed from the Spit other than based on perceived "user conflict." BCHW is very concerned that this restriction was reached simply because the Service felt that, to resolve the perceived issues, it was easiest to focus on a group that had little voice in order to show some kind of management restriction rather than make efforts to control the large volume of pedestrian visitors, including those disturbing birds while playing in the driftwood piles. The Service indicated that there is a growing senior population and implicitly suggests that this somehow justifies reducing horseback riding. If in fact there is a rising senior population, this is an excellent reason to actually allow for more riding than is currently allowed. Indeed, for ADA accessibility, horseback riding is about the only non-motorized use that allows physically limited individuals to visit our Wildlife Refuges and our other federal outdoor lands. Seniors can visit our beaches, and if allowed, ride out to the Lighthouse. They would not have to be left back at the parking lot or at home while their family and friends go to the Refuge. Moreover, the senior population the Service mentions constitutes the majority of the Back Country Horsemen work force that volunteers to pack horses, build and clear trails, and maintain our public lands. While the Service appears to take the view that this group is feeble and unstable (by claiming that equestrians need to be removed to protect senior citizens), no one told most of these older Americans of this conclusion.

U.S. Fish and Wildlife Service
January 21, 2013
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G. Conclusion

BCHW appreciates the opportunity to submit the foregoing comments.

Very truly yours,

THE GARDEN LAW FIRM, P.C.

Kevin R. Garden

Kevin R. Garden

Enclosure

cc (w/encl):

Michael K. McGlenn
Chairman
Back Country Horsemen of America

Earley, Melissa

From: Crawford, Donald
Sent: Tuesday, May 23, 2023 1:37 PM
To: Sunny Marlow
Cc: Crawford, Donald
Subject: RE: I support horseback riding at Dungeness Rec Area

I appreciate your correspondence. I will pass it on to the Parks Advisory Board for further consideration. This topic is only in the early stages of discussion, and your input is helpful.

R.Donald Crawford, CGM
Director
Clallam County
Parks, Fair, & Facilities Department
223 East Fourth Street, Suite 7
Port Angeles, WA 98362-3000
360.797.8283 cell



From: Sunny Marlow <jan.savvyrider@gmail.com>
Sent: Monday, May 15, 2023 9:33 AM
To: Crawford, Donald <Donald.Crawford@clallamcountywa.gov>
Subject: I support horseback riding at Dungeness Rec Area

Dear Mr. Crawford -

I write to strongly support the continuation of horseback riding at the Dungeness Recreation Area.

I'm a relatively recent arrival in Sequim (2016) and one of the main reasons that I chose Sequim was because of the existence of horse trails. This is one of the joys of this lovely area. And Dungeness Recreation Area is one of my favorites - it's open terrain, rarely muddy, makes for a nice ride and offers a different experience than Robin Hill Farm or Miller Peninsula.

I ride at Dungeness two to three times a month. In the years that I have been riding there, I have never witnessed a situation with hikers or dog walkers that I consider dangerous to myself or to them. On the contrary, most hikers that I encounter are polite, courteous, and enjoy seeing the

horses. We can stop and chat, their children can pet my horse giving them great exposure to an animal they may not often see.

Safety is everyone's concern, no matter how we use the park. Dogs are not supposed to be off leash, so banning horses because a loose dog might cause an accident is punishing the wrong parties. The riders are following the rules. A better solution would be to discipline those who let their dogs run free.

The fact that we make up a relatively small percentage of users of the Rec. Area is not a reason to ban us, but rather speaks in favor of our continued use - the likelihood of numerous encounters is slim - and I've never felt that myself, my horse or anyone else sharing the trail is in jeopardy.

As to riders going off the trails, that is a concern and should be addressed. Riders should respect the park rules and shouldn't do it. Perhaps a few signs reminding riders that horseback riding is not allowed in the areas that are off limits would be a better solution. There are already signs on the trails to that effect in other parts of the park. Most riders are conscientious about staying on the horse trails, and everyone I've spoken to does stay on the trails, so I think a reminder that the deer trails or other natural habitats are not for horses, would solve this problem.

Please don't take away a valued and lovely park for those of us who enjoy it on horseback.

Sincerely,

Janis Marlow Ph.D.

--

"Fairy tales are more than true, not because they tell us dragons exist but because they tell us dragons can be beaten."

G.K. Chesterton

Earley, Melissa

From: Crawford, Donald
Sent: Tuesday, May 23, 2023 1:51 PM
To: Cheryl Smith
Cc: Crawford, Donald
Subject: RE: Horses at Dungeness

I am sorry for the delayed response. It will be on Monday, July 10th at 530pm in the Board of County Commissioners Board Room in Port Angeles.

R.Donald Crawford, CGM
Director
Clallam County
Parks, Fair, & Facilities Department
223 East Fourth Street, Suite 7
Port Angeles, WA 98362-3000
360.797.8283 cell



From: Cheryl Smith <cheryldtr@gmail.com>
Sent: Tuesday, May 9, 2023 7:20 PM
To: Crawford, Donald <Donald.Crawford@clallamcountywa.gov>
Subject: Re: Horses at Dungeness

Thank you! When and where is the July meeting?
Cheryl smith

Sent from my iPhone

On May 9, 2023, at 3:26 PM, Crawford, Donald <Donald.Crawford@clallamcountywa.gov> wrote:

I'm sorry for not getting back to you sooner. Your email will be forwarded to the county park board for their July Meeting. The conversation is very early in the process. Please continue to participate, as every voice counts.

Kindest Regards,

R.Donald Crawford, CGM
Director
Clallam County
Parks, Fair, & Facilities Department
223 East Fourth Street, Suite 7
Port Angeles, WA 98362-3000
360.797.8283 cell

<Picture (Device Independent Bitmap) 1.jpg>

-----Original Message-----

From: web_parks <web_parks@clallamcountywa.gov>
Sent: Friday, May 5, 2023 2:23 PM
To: Crawford, Donald <Donald.Crawford@clallamcountywa.gov>
Cc: Dungeness Park <ccpdu@olypen.com>; Peter Craig (psjcraig@olypen.com) <psjcraig@olypen.com>
Subject: FW: Horses at Dungeness

Please see the email below.

Melissa Earley
Administrative Operations Coordinator
Clallam County Parks, Fair & Facilities
NEW: 360.565.2659

-----Original Message-----

From: Cheryl Smith <cheryldtr@gmail.com>
Sent: Friday, May 5, 2023 1:16 PM
To: web_parks <web_parks@clallamcountywa.gov>
Subject: Horses at Dungeness

Riding the mellow trails at Dungeness Rec area is one of the reasons my family moved here in the first place! Please don't ban us from these public, multi-use trails! For those pf us who don't feel safe riding the busy, paved Olympic Discovery Trail or along our narrow county roads with auto traffic, this park is invaluable to us!

What is status of this plan, please?

Cheryl smith
Agnew

Sent from my iPhone

Earley, Melissa

From: toni.shearer@biopappel.com
Sent: Friday, June 2, 2023 1:49 PM
To: Crawford, Donald
Subject: Dungeness Recreational Area - Horse Ban

Hello Mr. Crawford....

I'm Toni Shearer, I'd like to write to you about the proposal to ban horses from the Dungeness Wild Life Recreational Area.

My husband and I bought property (229 Nisbet Rd) across the street from the Recreational area this May. One of the selling points (for us) on the property was having access to the recreational area to ride our three horses.

Over a year ago when my husband was offered his position at Port Townsend Paper, the only way he got me to agree to move was the desire to ride at Dungeness. My stepmother and I had been up here years and years ago, while we were walking on the Spit, we saw riders out there.....it was a beautiful thing, a ride horsemen and women would cherish. Once we arrived here, of course, I found out riding on the Spit was no longer a possibility. I was crestfallen. Fast forward to the recent proposal to ban horses from the recreational area altogether, I'm absolutely devastated that we may lose this privilege as well.

Unfortunately, there will always be rule breakers.....equestrians, cyclists, mtn bikers and even hikers...are alike in that regard...why should just one group pay?

I'm writing on behalf of my family and in support of the equestrians I've met here on the Peninsula, to support horsemen & women in the continued use and the ability to enjoy the Dungeness Recreational Area from horseback.

Kindest regards....

Thank you...

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Re: Horses at Dungeness Park
Date July, 2023

Hello, To Whom it may concern,
Please allow us to introduce ourselves, we are Lorelli and Steven.
We have lived in Sequim since 1982. In our early 70's, we are active walkers, hikers, rock climbers, free divers, mountain bikers, exhibition dancers, world travelers and former EMT's.

To be clear of our intent...

The banning of horses in the Dungeness Recreation Area is a bad idea!

According to John Graham, the main reason to ban horses is one, single, solitary accident that happened in 2012. If the situation was so dangerous, why did it take more than 10 years to consider a ban of horses? Easy answer, the situation is not dangerous!

His number 1 and only point is,

“Mainly, the increase of daily walkers with dogs often off leash on all the shared trails.”

This has nothing to do with horses or their riders, but rather dog owners who do not have proper control of their dogs. There are many trails to walk a dog without going onto a horse trail. There are many signs posted that when pedestrians or bike riders are on a horse trail, the horse and rider has the right of way. (Yield to the horse)

Using these trails for decades, we have never have seen a horse and only the rare dog. (Do we have any experience with dogs and horses? We were the head dog trainers of a large training facility in Seattle and were trained and worked with the former head of K-9 for the Philadelphia Police Department. We trained for basic and advanced obedience as well as full guard and attack. We were also Bear trainers and handlers at the Olympic Game Farm, trained by Al Nemala from Walt Disney. We spend time each week at a local horse boarding stables. We know about animals!)

A lack of dog control coupled with a lack of situational awareness is what needs to be addressed. Most (98%?) of the dogs that we interact with are sweet and nice.

The owners simply have not gone through the necessary effort to learn how to control them. Dogs need to be trained for proper behavior and so do horses. Every horse rider we know has gone through many (average 20+ years) years of study, training and practice to control their horse. Our current (horse) teacher / advisor is 30 and has 28 years of riding experience.

This is not a horse issue, nor is it a dog issue. **If you choose to walk on a horse trail, pay attention to where you are and there will be no accidents.**

With a little common sense and politeness we all can get along rather nicely.

We thank you for your time and efforts on this important issue.

Lorelli and Steven

From: Candace Kathol, Diane Chung and Anna Plager
Park Master Plan Update Sub-committee

To: Director Donald Crawford & Clallam County Parks Advisory Board

Date: July 3, 2023

Re: Findings of the Sub-committee for Board Discussion

Background. Our existing 10-year planning window covers 2016-2026. Grant applications through the state now require a 5-year horizon to comply with state policy (citation?). Clallam County administrative policies vary depending on whether you want to amend or update the existing plan versus create a new 10-year Master Plan. See Master Plan, Chapter V, page 22, Policy 461.3 for amend-update and see page 23, Policy 461.4 for create a new 10-yr. plan.

Issue. When we amend or update the Parks Master Plan, the rules state that it shall be included on the Parks Board agenda and public input will be allowed prior to taking action. The decision is forwarded to the BOCC for review and adoption through resolution.

When we create a new Master Plan, rules require that every ten years a draft plan be prepared by staff or a consultant, special public meetings be held around the county, separate public notice and public comment forms documented, changes considered before producing a final draft for further public review, recommendations for the BOCC considered in a special work session and possibly another public hearing.

Discussion. A few items need to be changed now, such as a new public review and approval by the BOC to comply with state grant requirements.

Items to address in this Master Plan Update include:

- A. the name & description of the Thompson Road Property change to Rain Shadow Disc Golf Course (multiple occurrences in Chapter III & IV);
- B. the planning period horizon does not need to change from ten-year to five-year (Ch. IV, pg. 3.; Ch. V, pg. 24) to qualify for grant awards, so long as we conduct (and mandate in the plan) a five-year update requirement;
- C. the estimated costs for Development and Capital Improvements in Existing Parks (Ch. V, pg.18) have increased significantly. We do not see the point in listing low priority projects on this chart.

Additionally, several background items to consider for this update include:

- the Organization Chart (if this has changed in 8 years)
- the Population and Parkland Acreage, based on the 2020 census instead of the 2010 census, and the 2012 Growth Management Act Population Projections (Ch. IV, pg.10, items 4 & 5)
- the 2010 census information and projections cited in Chapter V, pg. 1, PP2 should be replaced with 2020 census information.

Recommendation.

The public will be best served with an update or amendment in accordance with County Policy 461.3, followed within a few years by a full 10-year review in accordance with 461.4 that includes a 5-year update requirement.

Also, the Sub-committee recommends a fully-developed process for the next new Master Plan (2027-2037) that complies with the spirit & intent, not just the letter, of the code requirements. Further, we aspire to have adequate resources assigned to accomplish the full plan review by the 2027 due date, including:

- a widely-announced public-input campaign, perhaps another user survey;
- park staff & park users and related user groups should be fully-engaged with meaningful participation for their ideas and concerns;
- be open to potentially substantive changes, with advice from consultants;
- review public comments & reflect proposed changes back to the public;
- a scheduled work session with the BOCC;
- sufficient knowledgeable staff and resources available to conduct a thorough process;
- require and schedule a plan update/amendment every five years.

We believe that the best way to gain support for the public's park & recreation needs is to listen carefully to their concerns and to reflect them in the new Master Plan. It seems that our county budget has not addressed our development or CIP priority projects, including basic maintenance needs, so we will need to rely heavily on competitive grants opportunities. The new Master Plan will be an opportune time to build our case.

Thank you for your consideration of these concerns.

**Proposal to establish a
Cascadia Marine Trail campsite
at
Salt Creek Park**

**Submitted by
Washington Water Trails Association (WWTA)**

**to
Clallam County**

May 30, 2023

Proposal for a Cascadia Marine Trail campsite at Salt Creek Park - DRAFT

Background

Washington Water Trails Association (WWTA) proposes that Clallam County Parks and Recreation open an area at Salt Creek Park for overnight camping for non-motorized boaters. In 2023 the Cascadia Marine Trail is celebrating its thirtieth anniversary. From an initial 20 campsites along Puget Sound shores the Trail has expanded to 60 campsites serving the safety and recreational interests of people traveling in human-and wind-powered beachable boats. There are currently some major gaps in the trail; a campsite at Salt Creek would fill one of those gaps expanding out the Strait of Juan de Fuca, providing a safe haven and a passive-use recreational opportunity for both residents and visitors to Clallam County.

The Cascadia Marine Trail has been recognized as a trail of national and international importance. In 1994 the United States Department of the Interior designated it a *National Recreation Trail*, the first water trail to achieve this status. In 1996 the trail won the *EcoTourism for Tomorrow Award for the Americas* in an international competition sponsored by British Airways National Millennium Trail. In 1999 the White House selected the Cascadia Marine Trail as one of only sixteen trails in the United States to be a *National Millennium Trail*. Washington Water Trails and its water trail partners have also garnered other national attention. The National Park Service awarded the Lakes-To-Locks Water Trail in King County its *Partnership Award in Recreation – Nationwide* in 2002.

WWTA helped create the Cascadia Marine Trail working with two state agencies in 1993: the Washington State Parks and Recreation Commission and Department of Natural Resources. Today WWTA has fruitful partnerships with many city and county park departments, port districts, and other non-profit organizations, such as the Trust for Public Land. WWTA works with Washington State Parks, Jefferson County Parks, Island County Parks, the City of Oak Harbor, the Town of La Conner, Kitsap County Parks, Vashon Park District, Anderson Island Park District, and Mason County Parks and Recreation among others.

Considering that there are few places to beach a boat heading west out the Strait of Juan de Fuca, and that the owners of the Crescent Beach and RV Park are somewhat hostile to anyone landing on their beach (we have heard of situations where injured people have tried to land to get help but were turned away), the one spot to land is on the east side of Salt Creek. The walk from there to the vault toilet in the parking lot is mild, and so to add a campsite just to the east near the large overflow parking area would seem possible.

Eventually it would be helpful to continue expanding to Neah Bay.

Cascadia Marine Trail Goals

The goals for the Cascadia Marine Trail, as determined by WWTA and Washington State Parks and Recreation Commission (October 23, 1992) are for:

Camping Areas

1. Securing camp areas every 5 to 8 miles
2. Locate camping sites on uplands accessible from the beach
3. Identify and describe public and private launch sites with parking conditions and costs

4. As much as possible, campsites should be accessible only from the water
5. Select camping areas to minimize environmental impact
6. Identify potable water sources
7. Establish capacity for each camping area

Character of Campsites

1. Campsites and associated beach are to have minimal development and be designed for minimal impact use
2. Human waste disposal provided in camping areas should have minimal environmental impact
3. Camp areas are to be open all year whenever possible

Use of Campsites

1. Non and human waste is to be packed out
2. Use of open fires is discouraged
3. Use of portable stoves for cooking is to be encouraged
4. Campsites are intended for one or two night use

Evaluation of the Salt Creek Park site

During the 1992 planning for the Cascadia Marine Trail, Washington State Parks created a vision for each (Washington State Park) water trail marine park.

“It will ultimately have:

- A beach or small landing area

- Stable access to uplands from high tide line

- A signed, designated camping site near the beach which is suitable for several people and includes table and camp stove

- A nearby vault toilet facility (minimum)

- Room to secure boats overnight above high tide line

- A fee collection station/shelter

- Water if available”

The Salt Creek Park property presently has adequate passive use facilities in place for such a “water trail marine park.”

It is situated above a beach with hundreds of feet of sandy shore accessible at all tide levels

- It has stable access to the upland from the high tide line

- It has a suitable flat area for overnight camping

- It has a toilet in the parking lot area

- It has room to secure boats overnight above the high tide line

- A fee collection station could be installed if Clallam County Parks determines it should charge for camping. Washington State Parks uses unmanned “iron rangers” to collect such fees at unattended campsites.

The major component is a determination of a camping policy (and any fee structure that may accompany such a policy) which might be similar to the existing policy of Salt Creek Park.

Creation of the Salt Creek Park Cascadia Marine Trail campsite

An agreement with Washington Water Trails Association will mean that WWTa will provide a volunteer site steward to monitor conditions at the campsite. WWTa will plan and supervise volunteer work parties to maintain the site under supervision of Salt Creek Park. WWTa will provide a trail marker and informational bulletin board sign for the campsite. WWTa will promote use of the site using Leave No Trace principles. The agreement will spell out a limit for the number of overnight stays, except in the case of threatening conditions, and any other special considerations.

Users of hand-carried non-motorized boats will keep boats and camping equipment under supervision, lessening any possibility of mischief or theft leading to liability issues.

Clallam County Parks and Recreation may set fees or payment policies and reservations, if any, that best suit your administrative needs.

Enclosed are examples of the type of information that WWTa provides with a bulletin board, funded by and made by WWTa volunteers, and photos of signage at other Cascadia Marine Trail campsites.

Cascadia Marine Trail Signs



Detail of Cascadia Marine Trail “Carsonite” marker and placement



Cascadia Marine Trail Bulletin Board sign