



Kachemak Bay Birders  
98398 Bruce St.  
Homer, Alaska 99603

November 30, 2019

Dear Homer Planning Commissioners:

Kachemak Bay Birders is an informal organization of Homer area individuals who are interested in birds, birding, and the conservation of birds. We submit these comments on the Conditional Use Permit Application 19-07 primarily because of its negative impact on Homer Spit bird habitat.

While we agree that parking is a problem during peak tourist season in the vicinity of the Homer Port and Harbor, we believe that the proposed parking lot expansion plan is not an adequate or cost-effective solution for this limited three-month use seasonal issue and resulting beach impact. Additionally, the development proposal fails to address the future of sea level rise and storm surge tidal damage that will occur. Our most important objection is that that the proposed project does not comply with Open Space Recreation criteria. We acknowledge that a parking lot at a trailhead, such as the parking lot across from Mud Bay, utilized by many users of the Homer Spit Trail, can be compatible with these criteria. But we believe that the primary users of the proposed parking lot will not be there for recreation purposes. Most users of the existing parking lot visit the nearby restaurants, bars, and shops. Existing parking is more than adequate to serve these recreational users.

We are particularly opposed to Phase 2 of the proposed project, which will permanently alter the grassy beach above the supratidal area. This grassy area is one of the last remaining natural beaches on the outer end of the Spit and provides habitat for some species of songbirds and adds special enjoyment to a walk on the Homer Spit beach. While the project proposers mention their intent to provide access to the tideland, this doesn't recognize that an undisturbed grassy beach in the foreground is also an important part of the view and enjoyment.

We also believe that the city has not adequately explored other questions and options for parking that could be less expensive and have less impact on relatively undisturbed parts of the Homer Spit. Some of these are;

1. During the Nov. 6 public hearing, many suggested using parts of the Spit that are already graded, have gravel, and are less likely to contribute to beach erosion. With better signage and marking, these areas could reduce the parking problem. We request that the City review this testimony.
2. Many comments also pointed out that most of the Spit parking lots do not make effective use of the available parking areas. There is a lot of haphazard parking. Would the placement of concrete bumpers in some areas make better use of space?
3. It appears that there has not been any discussion about the difference between providing parking for only cars and pickups and mixing large RVs that have limited turning ability with other vehicles is poor utilization of parking.
4. How much of the need to provide parking on the Spit is the responsibility of the City of Homer? Many commercial shops have parking.
5. What are the day-use parking plans of Heritage RV Park and other Spit landowners?

If a traffic/parking plan shows a need for the proposed parking expansion at the Memorial then we propose the following:

1. Modification of Phase 1: Improvement of the existing parking lot at the Seafarer's Memorial to make better use of space. This would essentially be a modification of Phase 1 with a slight fill of the existing lot to provide a more squared off lot that would be more suitable for established lanes and designated parking spaces. To make efficient use of the space, this lot should allow only vehicles under a certain size (essentially autos and pickups). The lot should not be paved. Gravel allows better percolation of water and less runoff of vehicle oil, etc. The lot should be ADA compliant, and improvements should include an established walkway to the beach to mitigate pedestrian damage to beach grasses.
2. Deletion of Phase 2.
3. While improvement of the existing parking lot may add parking spaces to this part of the Spit, it would be only a partial solution. Has a comprehensive parking plan for the entire Spit been developed and/or examined?
4. There is a need to develop a parking fee policy. We recommend three zones be established:
  - a. High fees for most convenient parking adjacent to the commercial area on the west side of the harbor. An exception to the fee would be drop-off areas near the ramps.
  - b. Low fees for parking that requires short walks to commercial areas.
  - c. No fee for more remote parking that may require a drop-off.

We commend the Commission for not deciding this issue at its November 6, 2019 meeting; there were too many unresolved issues. We offer this amended plan. Perhaps an altogether new plan is needed that would incorporate elements other than the proposed Seafarer Memorial parking lot.



Sincerely,

*Carol Haideag*

Kachemak Bay Birders Chair

CC: Parks, Art, Recreation and Cultural Advisory Board

CC: Port and Harbor Commission

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Extracts from:

Staff Report 19-85 to Homer Advisory Planning Commission regarding CUP 19-07  
Oct, 2, 2019

Comprehensive Plan: Homer Spit Plan Goal: Wise land management of the Spit and its resources to accommodate natural processes, while allowing fishing, tourism other marine related development, and open space/recreational uses.

The western 20 feet of the parcel, and the tidelands in front of the parcel (not on the lot itself) are bound by a Land and Water Conservation Fund project. In exchange for funding for the Ramp 2 restrooms, the City agreed to conserve the beach access on the property, and the tidelands seaward of the property line.

Criteria for CUP

b. The proposed use(s) and structure(s) are compatible with the purpose of the zoning district in which the lot is located.

HCC 21.32.010: The purposes of the Open Space – Recreation District are primarily to promote public recreational opportunities while protecting and preserving the natural and scenic resources of the area and public access to tidelands. Generally, pedestrian uses are given priority over motorized uses.

Applicant: The proposed parking area is compatible with the zoning district as it will provide localized parking as well as allow direct access to a city park (Seafarer's Memorial), the beach, and nearby businesses. It is not assumed that the structure will negatively impact adjoining properties, or be out of harmony or proportion in relation to other nearby parking areas.

Finding 2: The purpose of the Open Space – Recreation includes providing for public recreational opportunities and public access to tidelands. The parking lot will provide ease of access to Homer Spit attractions such as the beach and small boat harbor. The pedestrian trail to the beach will enhance beach access opportunities for all users, and is compatible with the purpose of the district.

Analysis: Desirable neighborhood character could be described by a portion of the Purpose statement for the district, to promote public recreation while protecting and preserving the natural and scenic resources of the area and public access to tidelands.

- Public recreation will be promoted by addressing the organization of the parking lot, creation of ADA parking spaces and paved pedestrian pathway to the Seafarer's Memorial and to local businesses. The parking spaces will serve beach visitors, business customers, and harbor users on their way to enjoying Kachemak Bay.
- Public access to tidelands will be preserved and enhanced by the phase two construction of a pathway down to the beach area.
- Full construction of phases one and two will result in the loss of public beach area, particularly with phase two.

Applicant: First and foremost, the special improvements of this project are made with an increase in safety for both pedestrians and vehicles in mind. The new parking lot layout provides controlled points of ingress and egress and removes the need for vehicles to back directly into the on-coming traffic of the Sterling Hwy when trying to exit a parking space. A 10' wide paved pedestrian corridor running down the middle of the parking lot allows connecting pedestrian access between local businesses and the adjacent park, eliminating the need for pedestrian foot traffic along the roadside. The planned 10' wide paved pedestrian corridor will also run alongside 6 new designated handicap spaces allowing people with limited mobility easier access to these same businesses and the public park. With the same public access and enjoyment in mind, an ADA compliant gravel trail will connect the parking area to the public beach recreation area. There is currently no nearby ADA compliant trail that provides access to the base of the natural swale where the beach level begins. The Homer Spit has spectacular vista views from the beach and everyone should have access to enjoy this valuable and beautiful public recreation area. Along this trail, in areas along the pedestrian path, and in the areas surrounding the parking lot, the natural beach grasses that were transplanted at the beginning of the project will be planted back into the landscape. The native beach grass is not only aesthetically pleasing, but has the added benefit of helping with hillslope integrity and preventing erosion. Also, because the native grasses are naturally occurring in the area, it is low maintenance in terms of landscaping when used ornamentally and will create a seamless blended border into the natural areas surrounding and around the project area.