



WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**  
Peter Goldmark - Commissioner of Public Lands

March 3, 2015

Jeremy Sikes  
Dept of Ecology  
4601 N Monroe  
Spokane, WA 99205

RE: Comments on the City of Moses Lake Shoreline Master Program

Dear Jeremy:

Thank you for the opportunity to provide comments on the City of Moses Lake Shoreline Master Program update. I am attaching a table that includes the Department of Natural Resources (DNR) specific comments. The Department of Natural Resources is pleased to see that the City of Moses Lake has proposed a shoreline master program Aquatic shoreline environmental designation that covers areas waterward of the ordinary high water mark (OHWM). As you know, these areas are generally managed by DNR, and as managers and stewards of these lands, the Department seeks to maintain a balance of benefits provided by state-owned aquatic lands for the benefit of the citizens of the state of Washington. These benefits include: encouraging direct public use and access; fostering water-dependent uses; ensuring environmental protection; and utilizing renewable resources. The Department would like to congratulate the City of Moses Lake for updating its Shoreline Master Program. DNR's comments are offered from the perspective of a land manager rather than a regulator. The Department is always looking for opportunities to plan and coordinate with local governments engaged in updating shoreline master programs and our hope is that these comments are helpful.

If you have questions, you may contact me at (360) 902-1126 or [hugo.flores@dnr.wa.gov](mailto:hugo.flores@dnr.wa.gov)

Sincerely,  
Hugo Flores  
GMA-SMA Coordinator

Location	Text	Comment	Suggested Language
Chapter 7. 7-30 Boating Facilities. 7-30-020.(1) Policies Page 3	Boating facilities should be located to...provide maximum feasible protection and enhancement of...	Provide criteria that defines how “maximum feasible protection and enhancement” will be achieved or remove these qualifiers.	Remove “maximum feasible”
Chapter 7. 7-30 Boating Facilities. 7-30-020 (6). Policies Page 3	Floating homes, houseboats, and liveaboards should be prohibited.	Please consider using SHALL instead of SHOULD.	Floating homes, houseboats and liveaboards shall be prohibited.
Chapter 7. 7-30 Boating Facilities. 7-30-030 (3). Regulations. Page 4	Placing fill...except minimum required for dock-to-shore attachment site (abutment)	Please provide a numerical value for “minimum required.”	N/A
Chapter 7. 7-30 Boating Facilities. 7-30-030 (5). Regulations. Page 4	...The City shall request technical assistance from agencies with jurisdiction...	Consider adding DNR to the list.	The Washington departments of Ecology...and Natural Resources.
Chapter 7. 7-30 Boating Facilities. 7-30-030 (13). Regulations. Page 4	...Boat houses, as non-water dependent structures, are prohibited.	Consider clarifying how a boathouse can be used as a non-water dependent use.	Boathouses, as a residential use, are prohibited.
Chapter 7. 7-40 Commercial Uses. 7-40-030 (1)(b). Regulations. Page 5	Navigability is severely limited at the proposed site...	Please provide criteria assessing severe limitation on navigability.	N/A