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February 21, 2004

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Gentlemen:

You have retained me to review and comment upon the plans of the Department of Natural Resources to construct a boat launching site on the former Labadie property located on Crystal Lake, Benzie County, Michigan.

I should first outline my credentials to show that they are applicable to this situation. I served as Director of the Michigan State Waterways Commission for 12 years, Chief of the Waterways Division of the Department of Natural Resources for 18 years, and Acting Deputy Director for Recreation for one year. During my public service I was responsible for public recreational boating facility programs. These included the Public Access Site Program (PAS) that then involved 670 state-owned sites; the operation of 13 public docking facilities; the operation of the locks at Cheboygan and Crooked Lake; and the commercial docking facilities at Mackinaw City and St. Ignace. Combined, these programs resulted in construction of 25 harbors-of-refuge, 4,121 transient and seasonal slips at 69 marinas and docking facilities, and 115 locally-owned boat launching sites. I became affiliated with Public Sector Consultants in 1987 and was the principal author of the *Handbook for the Location, Design, Construction, Operation, and Maintenance of Boat Launching Facilities; Guidelines for the Design of Barrier-Free Recreational Boating and Fishing Facilities; and Design Handbook for Recreational Boating and Fishing Facilities*, published under contract with the States Organization for Boating Access. I have also aided the State of Minnesota in establishing a network of refuge harbors on Lake Superior and four counties in South Carolina in determining the need and for and location of boat launching facilities.

I have reviewed the Overall Site Plan prepared for the DNR by M. C. Smith Associates and Architectural Group dated 11/19/03. The plan shows an entrance from a relocated Mollineaux Road and a paved access road leading to three parking areas, one of which is paved, and then to the launching area that provides four ramps, two boarding docks, and a mooring pier. Restrooms are provided at both the ramp and parking areas as are parking

spaces for persons with disabilities. One of the three parking areas is paved and the other two are apparently to be graveled. I do not know whether or not parking bumpers designating individual parking slots will be provided in the graveled areas.

The site follows the standards that were developed during my administration of the PAS program. These standards assumed an existing demand for sites on inland lake proportionate to the size of the lake less any existing sites. Crystal Lake at 9,700 acres is one of Michigan's larger lakes and would qualify for two sites with parking for 100 car-trailer units under the earlier program standards. The plan for this site, providing parking for 106 car-trailer units, basically meets those standards. The standards were, and I believe currently are, considered to be constraints on the development of PAS facilities. In addition, they are generalities that must be examined at each potential site to assure their applicability.

The number of launching ramps provided is based upon the number of parking spaces and assumes easy proximity between the two. At high turnover sites, one ramp should be provided for each 20-30 parking spaces if a maneuvering area and boarding dock are provided at the ramp. This is based on the assumption that it takes 10 minutes to launch and 10 minutes to retrieve a boat, so each ramp can accommodate 50 launchings and 50 retrievals per day.

This site presents some unusual and particularly severe features that adversely impact the basic program design standards. The primary problem is the fact that the usable area of the site is in two separate portions, the one nearest the entrance appropriate for parking only and the other for boat launching only. Unfortunately, the parking area is located about 80 feet above and some 600 feet from the boat launching area necessitating a walkway with some 150 steps to traverse between the areas.

These physical constraints influence the design and use of the site. Because of the distance between the ramps and parking area, boats will remain at the ramp far longer than at the ideal site. This blocks use of the ramp by others until the boat is moved. To alleviate this condition, the site design calls for a mooring pier about 90' long to which a boat can be moved and left while the car-trailer unit is parked and the driver returns to the boat.

The parking arrangement calls for three parking areas or lungs, the first providing paved parking for 34 car-trailer units and two spaces reserved for persons with disabilities. The second and third areas provide a graveled surface with spaces for 38 and 24 car-trailers, respectively. There are also 18 paved cars only parking spaces, one of which is designated for persons with disabilities. According to my measurements, it is 595' feet from the closest ramp to the closest parking space and an additional 425' to the farthest parking space.

Under the circumstances, it is my belief the parking spaces being provided exceed any reasonable expectation of their need. Desirable though boating on Crystal Lake may be, the physical constraints of the site are so excessive they will greatly diminish the appeal

