

Bruce Ellis - Comments on New Marina at Lake Pleasant Regional Park

From: "Denny Anderson" <andersoden@cox.net>
To: <bellis@lc.usbr.gov>
Date: 8/4/2006 3:23:10 PM
Subject: Comments on New Marina at Lake Pleasant Regional Park

Dear Mr. Ellis,

Re: Draft Environmental Assessment Proposed Construction and Operation of the Scorpion Bay Marina & Yacht Club

The Environmental Assessment did not adequately address the boating safety concern that was identified during scoping. That is: ***"Concern was expressed that the increased number of watercraft out on the lake could result in significant impacts."***

Your conclusion was ***"Based upon these estimates, watercraft densities would still be within the range experienced on the other larger lakes in Maricopa County, even when Lake Pleasant's water elevation is lower than 1702 feet"***.

Watercraft densities are meaningless when you consider the accident data. Based on the accident data given in the EA, Pleasant averaged 27 accidents per year over 2003-2005.

3 times the number of accidents as Bartlett! More than twice the accidents at Saguaro! Almost 60% more accidents than Canyon! And more than 4 times the accidents at Apache!
 Lake Pleasant already has a disproportionate number of boating accidents

4-1

What is it about Lake Pleasant that generates all these accidents compared to other lakes? That's a question best answered by MCSO and Game & Fish. But in my opinion it's because it's a weekend "Party Lake". Its absolutely crazy out there during summer weekends! And I'd hate to think what the accident statistics would look like if MCSO didn't do the great job they do with their resources.

If the the Scorpion Bay Marina is allowed to be built, you predict a 68% increase in average boat traffic. Won't there will be a corresponding 68% increase in accidents, injuries and fatalities as well? The answer is yes, at a minimum we can expect not 27 accidents but 45 accidents per year. Now its 5 times the accidents at Bartlett, three and a half times Saguaro, two and a half times Canyon, and 7 times the accidents at Apache! But its likely to be worse than that. You can't pack 68% more boats into the same area and realistically expect to get a linear result. It will be more than 68% more accidents.

Yes, based on your calculations watercraft densities with the new marina will be in the range of the other lakes, but Pleasant is unique and that comparison is meaningless in light of the current and projected number of accidents at Pleasant. The new marina will present a significant impact to public safety.

And what will be the response to this public safety problem? Look at Lake Perris in California, an urban lake as is Lake Pleasant. Weekend boaters need to make reservations as the number of watercraft is closely managed, there's a 35mph speed limit on the lake, no towing of inflatables behind watercraft, and boats must be off the lake by sunset. The boating public does not want that to happen on Lake Pleasant! That would be a significant impact to our recreational use of the lake.

4-2

The EA states on page 41 in a section discussing impacts without the new marina: ***"It is anticipated that visitation to LPRP would continue to increase; given the amount of development in the area just south and southeast of LPRP, visitation to LPRP could increase at a greater rate than has been experienced in the past."*** I agree whole heartedly! From 1990 to 2005 Peoria had 171% growth and Glendale 59% growth. Surprise had 246% growth from 2000 to 2005 alone! Not to mention New River didn't even exist 10 yrs ago. None of this nearby astronomical growth has been factored into this study and it is a significant impact to Lake Pleasant. This factor alone, without the new marina traffic, will make weekend boating on Lake Pleasant unfeasible without proper management. In fact, there should be a Lake Management plan created now to deal with visitation growth alone.

4-3

The EA states: "The County has indicated that prior to implementation of Phase IV, it intends to conduct a study to establish guidelines for managing the number of watercraft out on the water at any given time, to assist in its management of recreational activities at LPRP." I'm sorry but that's insane, why build it first then try and fix what you screwed up? The County needs to do a full study now with the County, Bureau of Reclamation, MCSO, Game & Fish, the Maricopa Water District, and public input. And it must include additional boaters due to nearby population growth.

4-3

What is the view of the general boating public?? Was it last given at the 1997 review of the Master Recreation Plan EA?? If so, that's still too long given the growth of Phoenix metro area in the last 10 years.

I therefore strongly oppose a Finding Of No Significant Impact (FONSI), or even a Mitigated FONSI on the construction of the Scorpion Bay Marina & Yacht Club for the following reasons:

4-4

It poses a significant impact to Public Safety, a significant impact to recreational boating quality, and there are a significant impacts to Public Safety and recreational boating qualities due to visitation growth occurring in parallel that have not be addressed.

Sincerely,

Denny Anderson
Boater, Fisherman and resident of Maricopa County
602-867-4127

Sandy Eto - Fwd: New marina on Lake Pleasant

Page 1

From: Bruce Ellis
To: Eto, Sandy
Date: 8/7/06 8:23AM
Subject: Fwd: New marina on Lake Pleasant

>>> "Denny Anderson" <andersoden@cox.net> 8/6/2006 6:38:55 AM >>>
Mr. Ellis,

More info on current Lake Pleasant watercraft traffic.

The EA calculates only 434 watercraft on average for a 4th of July weekend.

4-5

I received information directly from an MCSO Lake Patrol Officer who worked Lake Pleasant this 4th of July weekend that "on the sat during the fourth of july weekend, it would be safe to say over 3000 (watercraft) on the lake."

Denny Anderson
602 867-4127

Bruce Ellis - New Marina EA boat traffic calculations

From: "Denny Anderson" <andersoden@cox.net>
To: <bellis@lc.usbr.gov>
Date: 8/4/2006 5:18:08 PM
Subject: New Marina EA boat traffic calculations

Mr. Ellis,

Here's what I found when reviewing the Lake Pleasant boat traffic calculations:

Scorpion Bay Marina calculations did not include the 375 dry storage locations implemented in Phase I. 20% of that adds 75 boats and raises the Average traffic increase from 68% to 90% And it raises the 4th of July traffic increase from 54% to 72%.

4-6

Using Google Earth, I counted the striped parking spots for boat trailers at th 10 lane ramp, 4 lane Castle Creek ramp, and at both the North and South Ramps at Pleasant Harbor Marina. All are open to the public.

Trailer Parking spots:

10 lane County ramp: 316 normally, but only 179 when lake is full because the spillway parking is flooded.

4 lane Castle Creek County ramp: 105

Pleasant Harbor Marina North Ramp: 184

Pleasant Harbor Marina South Ramp: 202

Total parking for watercraft trailers: 670-807

(There are also many opportunities for people to launch boats from the shore and park in the dirt but these numbers are not estimated or included above)

4-7

If you wanted to compare boat capacities to TNF maximums then wouldn't 807 be the number to use and adding the traffic from the old and new marinas you'd be at 1404 boats.

And its odd that County said MCSO closed LPRP ramps on Memorial day when that average for the weekend was 164 boats, and there are anywhere from 284 to 421 trailer parking spots in the LPRP ramps. And 4th of July, with the fireworks show and all 180 watercraft average seems low.

I think you need to get a better handle on ramp traffic for both the County and Pleasant Harbor ramps there is much more capacity available than is being counted.

Thank you and feel free to call me if you have questions.

Denny Anderson
 Boater, Fisherman, County taxpayer.
 602 867-4127

RESPONSE TO COMMENT LETTER NO. 4

DENNY ANDERSON

- 4-1. The information in Table 5 of the July 2006 draft EA (Table 9 of the October 2006 revised draft EA) was provided to give the reader a general sense of the number of accidents occurring at major lakes with marinas located in Maricopa County. Although additional information would be needed to better compare the boating accident records among the lakes mentioned in this comment, we can assume there are more watercraft using Lake Pleasant than any of the other lakes in Maricopa County on an annual basis and, therefore, there would likely be a higher number of accidents at Lake Pleasant.

According to the U.S. Coast Guard, national fatality rates were 5.5, 5.3, and 5.4 fatalities per 100,000 registered boats in 2003, 2004, and 2005, respectively (U.S. Department of Homeland Security/U.S. Coast Guard 2006). The number of registered boats and actual number of fatalities in Arizona, at the five reservoirs located in Maricopa County, and Lake Pleasant specifically for these years were as follows:

YEAR	# Registered Boats in AZ*	Projected Fatalities Based Upon Fatality Rate**	Actual # of Fatalities in AZ*	Actual # of Fatalities in Maricopa County*	Actual # of Fatalities at Lake Pleasant*
2003	147,213	8.1	7	1	1
2004	147,294	7.8	11	3	0
2005	148,343	8.0	5	0	0
*Source: Arizona Game and Fish Department 2003, 2004, 2005					
**Source: U.S. Department of Homeland Security/U.S. Coast Guard 2006					

The number of registered boats in Maricopa County is not a static number; it changes daily. According to AGFD, as of December 20, 2006, there were 60,574 active boat registrations in Maricopa County (Mr. Ron Christofferson, personal communication, December 20, 2006). Using this number to estimate the percentage of fatalities that could be attributable to boats registered in Maricopa County, one could expect about 41 percent of the projected fatalities (using the national fatality rates) to occur in Maricopa County, or 3.3, 3.2, and 3.3 fatalities for 2003, 2004, and 2005, respectively. As the above table indicates, Lake Pleasant is probably below the national average in fatalities. While the accident rate is of concern, it does not appear that Lake Pleasant is inherently more dangerous than other lakes.

- 4-2. We agree with the comment that more intensive management will be required as watercraft densities increase. Based upon our estimates of current usage of Lake Pleasant we believe "urbanization" of the Lake Pleasant experience is already occurring on Saturdays and Sundays during summer months. We expect use of the lake during off season and weekdays will change from a rural or suburban

experience to more of an urban experience over time with the continued pace of urban growth in northern Maricopa County.

Under Reclamation's 1990 Contract with Maricopa County, MCPRD is responsible for providing and controlling safe use of both LPRP and Lake Pleasant. MCPRD has indicated it will undertake a Water Recreation Opportunity Spectrum (WROS) study for LPRP within one year of commencement of the proposed marina's operation. This and the accompanying management study are intended to assist MCPRD in determining at what point management strategies should be implemented, and what those management strategies should be. MCPRD has included funding for these efforts in its FY 2008 budget request. How and when the management strategies will be implemented would be MCPRD's decision, in consultation with other stakeholders of Lake Pleasant.

We believe the increased pressure on the Lake can be better managed with the proposed action than without. The concession agreement would provide funding to MCPRD for operation and maintenance activities that would improve the management of LPRP now and into the future. It is expected the marina and its staff would lend a sense of management presence to the Lake. The marina staff would be trained in emergency and fire protection protocol, and would greatly reduce response time in emergency situations. The concessionaire has experience operating and managing 15 marinas across the country and could share its expertise with MCPRD in developing appropriate and effective management guidelines for the inevitable increase in boater use at Lake Pleasant.

- 4-3. As indicated in the EA, there has been tremendous growth in close proximity to Lake Pleasant, and with it we anticipate there will be increased demand for water-based recreation at Lake Pleasant. We believe this demand will occur with or without the proposed project.

The purpose of the WROS study that is to be carried out is not to establish a maximum number of boats that should be allowed on the Lake at any given time. Rather, the purpose of the study is to determine how to manage the number of boats that are on the Lake at any given time, given the physical conditions of the Lake, as well as management opportunities and constraints. We do not believe presence of the marina would constrain the study. Maricopa County, through MCPRD has agreed to initiate, within one year of commencement of Scorpion Bay Marina and Yacht Club's operation, a WROS study for Lake Pleasant Regional Park. The study would utilize the approach described in Reclamation Denver Technical Service Center's Water Recreation Opportunity Spectrum – Users' Guidebook (Haas et al. 2004). This study would identify the inventory of existing resources and conflicts that exist among the physical aspects, social use, and management practices of the water recreational opportunities, as described in the Water Recreation Opportunity Spectrum – User' Guidebook, that exist and are expected to exist in the future within LPRP. Concurrent with the WROS study, MCPRD would develop policies and guidelines that would be implemented upon completion of the WROS study, as

appropriate. Reclamation has agreed to provide recreational staff expertise to assist MCPRD in carrying out the WROS study and developing the policies and guidelines. Funding for this effort has been incorporated in MCPRD's FY08 budget request. This effort will include a public education and involvement component. Reclamation envisions that all Lake Pleasant stakeholders will be invited to participate in these efforts.

As part of the process to obtain public input regarding the proposed marina, Reclamation made an effort to locate boating and fishing organizations within the central Arizona vicinity via the internet and sent out an electronic mail request to several addresses indicating that anyone interested in receiving a scoping memorandum should request that their name and address be added to the mailing list. We also encouraged them to forward our request to anyone else they felt might be interested. We received several requests through our efforts. A scoping memorandum was sent to a mailing list of about 70 agencies, organizations, and individuals on March 1, 2006, including those that had responded.

- 4-4. Your opposition to the proposed project is noted.
- 4-5. We would like to preface our response by thanking the commenter for his overall thoughtful review of the draft EA, and for this comment in particular. During our research in response to this comment, we discovered errors were made in the initial computations to determine the annual daily average number of boats on the lake, as well as the average number of boats out on the lake on a holiday weekend. The estimated numbers of watercraft on Lake Pleasant have been corrected in the EA, and a preface was added to the October 2006 revised draft EA to point out the watercraft estimates have been adjusted.

Regarding watercraft out on Lake Pleasant on July 2, 2006, we agree the estimated number of watercraft on the Lake over the July 4th weekend indicated in the July 2006 draft EA (434) was substantially underestimated. This is due in part to the errors noted above, and also because of an increase in the number of watercraft visiting the Lake on that day in 2006 as compared to 2005. We are unable to specifically quantify the number of watercraft on the Lake on a specific day due to the fact that watercraft numbers for the Pleasant Harbor Marina are reported to MCPRD on a monthly, rather than a daily, basis. Therefore, in the October 2006 revised draft EA (see Appendix C) we estimated the peak season weekend day annual average daily watercraft count. We recognize the July 4th holiday weekend is a special situation, which typically has the greatest number of visitors to both the LPRP and Lake Pleasant; however, we believe the estimated peak season weekend day annual average daily watercraft count is more representative of the lake experience during weekends throughout the peak season.

- 4-6. In our research to respond to this comment, we discovered the July 2006 draft EA contained inaccuracies regarding the characterization of the fenced graded area identified as being constructed in Phase I. This area was labeled as "Outdoor

watercraft storage” in Table 1, on page 9 of the July 2006 draft EA, but was identified later in that same document as a “gravel parking areas for an additional 380 vehicles....” A more precise description of the area and its function would be to describe it as a 5-acre area that would be graded, graveled and fenced during Phase I. It would be available for a variety of uses, including but not limited to the following: vehicular and boat trailer parking; storage of trailers, boat racks, boats, personal watercraft, and supplies; and repair and service of watercraft. The EA has been revised to reflect this. Because the estimates of the number of boats stored at the marina that would be out on the lake at any given time reflects a “worst case” scenario, no additional adjustment for boats that might be stored and launched from this 5-acre fenced area has been made. For example, we did not consider that boats currently using the public boat ramps might rent slips at the new marina, thus our number could reflect double counting of an unknown number of boats visiting Lake Pleasant. We also assumed all the slips are rented 100 percent of the time. And finally, we used 20 percent to estimate the number of the moored boats that might be out on the Lake at any given time. Most individuals we talked to indicated this was likely to occur only during weekends and holidays during peak season, and that normally this percentage is much lower on any given day. Personal observations of MCPRD employees indicate many of the boats moored at the marinas are used as “second homes” or vacation destinations and, as such, they tend to remain moored or seldom leave the pier. In *Techniques for Estimating Boating Carrying Capacity: A Literature Review*, Holly E. Bosley indicates research studies estimated peak use rate, for boats moored at existing shoreline developments, ranged from 3.6 percent to 25 percent (2006).¹ In another study, estimates of the percent of total moored boats in use on four lakes in Michigan based upon aerial flyovers ranged from 1 percent to 3 percent (Progressive AE 2001). This further substantiates the assumption that the 20 percent used for determining average number of boats reflects a “worst case” scenario.

- 4-7. Please see response to Comment 4-5. The watercraft numbers in the October 2006 revised draft EA reflect a much higher number of watercraft on the lake than was indicated in the draft EA.

We would like to note the number of watercraft entering Lake Pleasant from LPRP is based upon the entry fees collected at the Park entry stations. Due to noncompliance at self-pay stations and alternative access points, the actual number of watercraft entering from LPRP may be slightly higher. Estimates for the number of watercraft using the boat ramps at Pleasant Harbor Marina are based upon boat ramp fees paid by Maricopa Water District to MCPRD on a monthly basis.

¹ It should be noted the 25 percent was a theoretical estimate used in a study for a lake in north-central Saskatchewan, Canada (Jaakson, et al. 1990).