

## Debbie Beadle

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**From:** Evan Maxim  
**Sent:** Monday, May 20, 2013 12:36 PM  
**To:** Melonie Anderson; Debbie Beadle  
**Cc:** Kamuron Gurol; Susan Cezar; Kathy Curry; Eric LaFrance  
**Subject:** FW: Sammamish CAO Comment Letter from the Lake Sammamish Kokanee Work Group  
**Attachments:** KWG Sammamish CAO Update Letter 052013 FINAL.pdf

Public Comment

*Evan Maxim  
Senior Planner  
City of Sammamish  
425.295.0523*

Effective March 1<sup>st</sup>, my email address is: [emaxim@sammamish.us](mailto:emaxim@sammamish.us). Emails sent to my old email address are being forwarded temporarily, however please update your email address for me accordingly.

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**From:** St. John, David [mailto:David.St.John@kingcounty.gov]  
**Sent:** Monday, May 20, 2013 11:53 AM  
**To:** Evan Maxim  
**Cc:** Eric LaFrance; Tom Odell; Don Gerend; 'trodell@comcast.net' (trodell@comcast.net); Aaron Bosworth; Amy Brockhaus; Andrew Gross; Anne Dettlebach; Annette Hoffman (annette.hoffmann@dfw.wa.gov); Baker Holden; Beavers, Tom; Berge, Hans; Bill Gerdts; Bill Way; Bob Everitt; Brad Thompson FWS; Carmen McDermott; Chad Jackson; Cleve Steward (Cleve.Steward@amec.com); Dallas Cross; Dan Nickel; Danielle DeVoe; Dave Garland; White, Dave; St. John, David; Don Gerend; Doug Hatfield; Eric Adman (snokingwatershedcouncil@gmail.com); Erica Tiliacos; Gary Smith; Gayeski, Nick - I (nick@wildfishconservancy.org); Grace Reamer; Heather Van Dorn; Ilene Stahl; Isabel Tinoco; Jamie Glasgow; Jeff Chan (Jeffrey\_Chan@fws.gov); Giambattista, Jennifer; Jerrallyn Roetemeyer; Jim Mattila; Joan Nolan; Joanna Buehler; Jodi Bush (Jodi\_Bush@fws.gov); Justin Spinelli; Kate Miller; Kathy Curry; Kerry Ritland; Kevin Connolly; Kirk Lakey; Kit Paulsen; Kurt Beardslee (kurt@wildfishconservancy.org); Lantz, Dan; Laura Geggel; Laurie Mann; Lincoln Vanderveen; Mamie Bolender; Mark Getzendaner; Mark Taylor; Matthew Baerwalde (mattb@snoqualmiation.com); Mike Mahovich; Mike Schmidt; Mulvihill-Kuntz, Jason; OLaughlin, Kate; Peter Herzog; Peter Holte (Pholte@Redmond.gov); Ray Mullen; Richard Farmer; Robert Metzger; Roger Tabor; Sam Wright; Stolnack, Scott; Shawna Blythe; Shirley Vander Veen; Tor Bell; Walt Pereyra (DrFish148@aol.com); Warren Kagarise; White, Dave  
**Subject:** Sammamish CAO Comment Letter from the Lake Sammamish Kokanee Work Group

Dear Mr. Maxim,

Attached please find a comment letter from the Lake Sammamish Kokanee Work Group in regard to the City of Sammamish's consideration of updates to its Critical Areas Ordinance regulations.

Please provide this letter to those with decision-making responsibility for these updates, and incorporate it into the public record for the decision-making process.

Please feel free to contact me if you have any questions about these comments.

Thanks much!

David St. John

**EXHIBIT NO.** CC59

On behalf of the Lake Sammamish Kokanee Work Group

May 20, 2013

Evan Maxim  
Senior Planner  
City of Sammamish  
801 – 228<sup>th</sup> Avenue SE  
Sammamish, WA 98075

Re: Proposed Updates to the City of Sammamish Critical Areas Ordinance Regulations

Dear Mr. Maxim:

I am sending this letter to you on behalf of the Lake Sammamish Kokanee Work Group (Work Group) in regard to the current efforts by the City of Sammamish to update its Critical Areas Ordinance (CAO) regulations. These updates are of interest to the Work Group given the implications of these regulations for habitat conditions in several streams in Sammamish that are critical to the near- and long-term viability of the native kokanee salmon population in the Lake Sammamish watershed. These streams include Ebright Creek, Pine Lake Creek, Zaccuse Creek, and George Davis Creek.

The Work Group is an ad-hoc collaborative group formed in 2007 and is focused on the goal of preventing the extinction and improving the health of the native Lake Sammamish kokanee salmon population such that it is viable and self-sustaining, and then supports fishery opportunities on the lake. The active membership in the Work Group includes representatives of the City of Sammamish and the other watershed local governments, the Snoqualmie Indian Tribe, the US Fish and Wildlife Service, the Washington Department of Fish and Wildlife, the Washington Department of Ecology, Trout Unlimited, Friends of Pine Lake, Save Lake Sammamish, additional entities, and residents of the watershed. Information about the conservation of native Lake Sammamish kokanee salmon and the collaborative efforts of the Work Group can be found at:

<http://www.kingcounty.gov/environment/animalsAndPlants/salmon-and-trout/kokanee.aspx>.

Kokanee salmon (*Oncorhynchus nerka*) are native to the Lake Sammamish watershed and are closely related to sockeye salmon. They were of historical significance to both Native Americans and early settlers of the Lake Sammamish watershed. They live their entire life cycle in freshwater, in contrast to sockeye, which are born in freshwater, migrate to and live in the ocean for several years, and then return to freshwater to spawn. Kokanee spawn in Lake Sammamish tributaries and along portions of the lake shoreline from roughly November through

March. Adults die within days after spawning. Their eggs incubate over the winter and hatch from roughly January through May. Kokanee fry emerge from the gravel and immediately migrate to Lake Sammamish to feed on zooplankton. Three to five years later the fish reach a size of 12 to 18 inches and return to their natal streams to spawn.

Kokanee once ranged throughout the Lake Washington watershed, spawning in numerous tributaries to Lake Washington, the Sammamish River, and Lake Sammamish. Today there are only a handful of streams in the City of Sammamish in which returning spawners are seen consistently, including Ebright, Zaccuse, George Davis, and Pine Lake Creeks. Kokanee returns once reached tens of thousands of fish, but in six of the past nine years the returns have numbered fewer than 1,000 fish and in 2008 and 2010 the returns numbered fewer than 100 fish. Two of the three historic runs of kokanee have been extirpated, and a once popular kokanee fishery in Lake Sammamish is now closed. The native Lake Sammamish kokanee salmon population is verging on extinction.

Given the life-long residence of kokanee in Lake Sammamish and its tributary streams, their health and survival are tied to factors within the watershed. Available information indicates that there are several known and probable causes for the decline of Lake Sammamish kokanee. Passage barriers (e.g., road culverts) are blocking access by kokanee to relatively significant areas of spawning habitat. Recent landslides influenced by anthropogenic activities have caused kokanee mortality. Issaquah Salmon Hatchery operations have historically directly reduced the abundance of kokanee, but due to management improvements these operations currently are not likely to be directly affecting the population. While catching kokanee in Lake Sammamish is prohibited by the Washington Department of Fish and Wildlife, there is documented unintentional catch of kokanee taking place. As a result of their freshwater residence, kokanee are not declining as a result of environmental conditions in the ocean or the large, marine fisheries that affect some other Pacific salmon populations.

Altered stormwater runoff patterns may be causing loss of kokanee eggs and fry due to channel scour, fine sediment accumulations, and reduced connectivity to groundwater and hyporheic flows. Landslides in the upper reaches of Ebright Creek have periodically increased the transport of sediment in the creek, and in early 2011 resulted in the loss of most of the kokanee fry production in Ebright Creek from the fall 2010 spawning run. Increased temperatures and decreased dissolved oxygen levels in Lake Sammamish make it harder for kokanee to find food and easier for the predators of kokanee to find them. The worsening of habitat conditions, especially in its current spawning streams and the lake, will likely drive the kokanee salmon population further toward extinction.

**The Work Group encourages the City of Sammamish to develop and adopt CAO updates that enable maintaining and supporting habitat conditions that will help conserve kokanee. Such updates would aid kokanee conservation if, for example, they helped avoid or minimized:**

- 1. changes to the hydrologic regime that would result in high, channel-scouring flows from November through May, when kokanee eggs are in the gravel and hatching out;**

2. **the introduction and transport of sediment above natural levels to stream channels;**
3. **the loss of native tree, shrub, and ground cover in close proximity to stream channels; and**
4. **the introduction of pollutants to the streams and the lake.**

The most recent (2012-2013) return of kokanee, which included more than ten thousand fish – more than five thousand of which were likely born in streams in the City of Sammamish – shows that current habitat conditions in streams and the lake can support significant numbers of kokanee. The CAO update offers an important opportunity for the City of Sammamish to protect and capitalize on the current capacity of its streams and the lake to support kokanee through all life stages. Recreating this capacity would be costly or impossible, and its loss would be a significant and potentially fatal blow to the native kokanee salmon population.

The Work Group appreciates the opportunity to comment on these proposed updates. We appreciate as well the significant support the City of Sammamish and its residents have shown for the efforts to conserve kokanee salmon. These efforts are just beginning to bear fruit, with the most recent spawning run being the best in several decades and important habitat on Ebright Creek now available for spawning as the result of a privately funded culvert replacement project. These efforts need to be sustained and supported, and the investments of public and private funding respected and built upon, in order for the community to fully realize their economic, social, and ecological benefits. We are hopeful that the CAO updates will sustain and support these efforts.

Sincerely,



David St. John

On behalf of the Lake Sammamish Kokanee Work Group