

SAVE LAKE SAMMAMISH

1420 N.W. Gilman Blvd., # 2565
Issaquah, Washington 98027

June 4, 2013

The Mayor and Council Members
City of Sammamish
486 228th Ave. NE
Sammamish, WA 98074

Re: Environmentally Critical Areas Ordinance Revision

Dear Mr. Mayor and Honorable Council Members:

Save Lake Sammamish is an all-volunteer, non-profit Washington corporation founded in 1989 to protect the water quality of Lake Sammamish and the environmental benefits of its watershed. On behalf of SLS, I add the following comments to those contained in the SLS letter dated May 16, 2013 concerning the Environmentally Critical Areas Ordinance (ECA) under review.

SLS is particularly concerned with the issues centered on amendments to the City's Shoreline Master Program (SMP) raised by Richard Aramburu on behalf of Wally Pereyra in his letter of June 4, 2013. SLS has taken the position for over two decades that piping untreated storm water carrying numerous pollutants is detrimental to the health of the Lake and the salmonids in the Lake.

Specific to storm water pipelines discharging into the Lake, these concerns include, but are not limited to:

- 1) Scour and disturbance of sediments at pipe's outfall, increasing Phosphorus in the water column.
- 2) Plume of concentration of pollutants at outfall in mixing zone
- 3) Because Lake Sammamish stratifies in the summer and generally does not turn over until temperatures drop in winter, the oxygenated strata cool enough to support the salmonids, is increasingly narrow. After the typical summer drought, when the first rains fall usually in late September or early October, a phenomenon known as the "first flush" washes accumulated pollutants from impervious surfaces into receiving waters. These cool fall rains tend to be at the same temperature as that Lake strata which supports the salmonids and will concentrate in that strata. As you all know, the salmon also are waiting in the Lake for the Fall rains to stimulate their entry into their natal creeks and to spawn. This adds risk and stress to the Chinook returning to the Issaquah Hatchery, as well as resident salmonids such as Kokanee.

Lake Sammamish is designated a "receiving body of water" by King County. However that does not mean that it can be carelessly used as a sewer and turned into a cesspool!. Sensitive Lake Protection Standards (SLPS) now called Sensitive Lake Water Quality Treatment Areas, Core Requirements Ch.1.2.B in the King County Surface Water Design Manual (KCSWM), used by the City also, requires that stormwater be infiltrated or treated to remove 50% of annual average total phosphorus (TP) prior to discharge to Lake Sammamish.

By reference, we incorporate the legal arguments and case law cited in Mr. Aramburu's comment letter to you today in his item #2 "The Council should not Piecemeal Shoreline Master Program Amendments from the ECA."

Continued...

A Non-Profit Washington Corporation

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EXHIBIT NO. CC 88

June 4, 2013
City of Sammamish

In our letter of May 16, we commented on Page 2, last paragraph:

“While these particularly fragile EHNSWB areas have been identified, it is **equally important to regulate runoff** from adjacent upland areas that drain into the EHNSWB areas.”

We concur with, and by reference incorporate, Mr. Aramburu’s comments and suggested change to language in the definitions section of the May 7, 2013 draft of the EHNSWB, pg.. 82, lines 6-7 as follows:

(b) Properties draining to the no-disturbance area. Properties draining to the no-disturbance area are within the Erosion Hazard near Sensitive Water Body Overlay. ~~that drain to the no-disturbance area.~~

SLS strongly opposes proposals to permit any “Pilot Projects” in the Erosion Hazards Near Sensitive Water Bodies (EHNSWB) and “no disturbance” areas. Permitting any type of development project in the most fragile geology within the City would be foolhardy at a minimum and potentially a huge liability. However, if any “pilot program” were to be permitted, we concur with and by reference incorporate, the suggestions in Mr. Aramburu’s letter Item #4 to strengthen protections for downstream and down slope properties and environmental resources.

We appreciate the Council’s work and urge you to craft an Environmentally Critical Areas ordinance that will enhance, not weaken, protection of the valuable natural resources of the City and region. Thank you for your consideration of our comments.

Very truly yours,

Joanna A. Buehler
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