

November 3, 2017

MS. Lindsey Ozbolt
Associate Planner
City of Sammamish
98075

SUBJECT: Comments Regarding East Lake Sammamish Trail Segment 2B –SSDP2016-00415

MS. Ozbolt,

Thank you for the opportunity to comment on this critical trail segment in Sammamish. I have visited the trail segment on many occasions and have looked at the plan set at City Hall. I support approval of the Shoreline Permit for the construction of trail segment 2B for the very reasons I supported the opening of the trail to public use 16 years ago.

1. Well designed and organized staff report

I want to start my comment letter by noting the well organized and well written staff report. Readers of the staff report can find clear guidance and references that make everybody's job easier. Thank you.

2. Key guidance to the County missing on project mitigation priorities and sequencing that would best meet the interests of the City of Sammamish

I understand the dynamics of a large project where the applicant and the City are challenging each other's ability to either construct project features or to control access and traffic requirements. With that said, a project of this size and importance to both the City and the County needs to have goals for the mitigation that better reflect the needs of the City as expressed in its environmental and planning documents and the County in its commitments to many of the same environmental goals.

No matter the width of the final project, temporary and permanent impacts to Sammamish wetlands, streams, and trees will occur. The City is currently pursuing an Urban Forestry Management Plan and several Storm Drainage Basin initiatives that include a concern about water quality. The City Council has approved substantial funding for habitat improvements to Zaccuse Creek with the intent of supporting recovery of Kokanee that crosses the project corridor. Several other streams identified as important to Kokanee recovery include Ebright and Pine Lake Creek. An additional un-named stream near the north end of the trail project has potential for supporting Kokanee spawning and is in fact slated to receive a fish passable culvert with the proposed trail segment 2B.

The ease of propagation of replacement wetlands and wetland buffers at a remote site, miles from the impacts to the wetlands, wetland buffers and streams in Sammamish is not a reason to have the proposed regional trail project leave Sammamish Kokanee recovery basins with permanently reduced wetlands, permanently reduced wetland buffers and an unknown effort at stream buffer reconstruction effort to restore critical stream buffers. (.20 acres or 8,700 square feet of permanent stream buffer disturbance, Table 3, Exhibit 42)

Whether the proposed project trail improvements are narrowed in places or not, the importance of the existing streams to Kokanee recovery and the wetlands to water quality and biological support to a healthy lake and near lake shore environment should be mitigated within the impacted basins and not at a remote location.

3. Proposed Conditions of Approval (9 and 10) support mitigating project wetland impacts at remote site under the King County land banking program do not make Kokanee recovery a priority.

- a) The staff report recommendations 9 and 10, support replacing project impacts to wetlands, wetland buffers at a remote site that would not replace the value and function near Lake Sammamish or replace the value and function of wetlands immediately adjacent to the impacted streams.
- b) There is no real environmental benefit to consider narrowing the project to reduce wetland impacts if the compensating wetlands are to be located miles away and inland from Lake Sammamish and our Kokanee spawning streams. Because the County Park property holdings are so substantial there is no reason to mitigate project impacts at an inland site several miles from the lake.
- c) The permanent impacts of the full width trail project are relatively small for a three and a half mile long project: .22 acres of wetlands, 1.48 acres of wetland buffers, .20 acres of stream buffers and .09 shoreline setback are relatively small for a 3.5 mile trail project. Some of the project impacts can be mitigated with improved property management that focuses on replacement of lawn and non-native plants with appropriate native plants. This can be part of the revised mitigation plan.
- d) Trail user volume will grow as the County adds bathrooms and parking lots. The trail system needs to safely support user volumes now and into the future. The two studies done and attached as exhibits to the staff report show just how popular this trail will be to residents and visitors alike.
- e) The County Parks Department ownership is large enough to mitigate the listed wetlands, wetland buffers, and shoreline setback impacts of the full width project many times over. The untapped on-site mitigation opportunities include wetlands that are currently maintained by residents as ornamental lawns, outbuildings that King County will remove over liability issues and to provide public access to public park lands. Some of the sites that could become part of the mitigation package and that would provide environmental value and function in the immediate project area are:
 - Remove shed/outbuildings between trail and Ordinary High Water at Station 301, Station 303,
 - Remove gravel parking at Station 306.
 - Stop mowing wetlands at Station 341 to 344 plus remove two or three outbuildings
 - Remove wood deck in 50 setback zone at Station 343+50
 - Remove shed in 50 foot setback zone at Station 345
 - Remove building in the 50 foot setback zone at Station 350
 - Remove shed or outbuilding in 50 foot setback zone at Station 351
 - Remove garage and invasive knotweed and bamboo from stream buffer replace with native plant species. Also opportunity to daylight additional un-named stream.
 - Remove building/deck in the 50 foot setback zone that is also in wetland 21 AC at Station 355+80 and stop mowing

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455+50
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Mark Cross

- Remove deck in the 50 foot setback zone and also in wetland 23B at Station 374+50
- Remove plywood decking covered in astro-turf from stream at 464+20 and replace with native shrubs. Note that the offending wood and plastic may be on the Inglewood Beach Club property. Either way it's got to go. This stream is getting a new fish passable Kokanee recovery stream and astro-turf is not compatible with streams and stream buffers and does not provide shade, refugia or water quality treatment benefits.

4. Suggested mitigation priorities and additional mitigation to consider for the impacts of the trail project for the full width alternative

- Mitigate project impacts in the immediate project vicinity. Outbuildings that are scheduled for removal as a liability to the County and not slated for retention are closer to the lake than the trail. They could be calculated into the overall project impacts. King County can protect wetlands that have been altered and allow these areas to be replanted. Restored wetlands very near Lake Sammamish and along the trail segment have the potential to provide important water quality and habitat value and function.
- Give mitigation priority to restoration work that supports our Kokanee recovery streams within the project boundaries.
- Give mitigation priority to mitigation work that will improve water quality along the stream banks and buffers of the Kokanee recovery streams within the County controlled property. Removal of buildings and fill from the streams and stream buffers, where possible, should be replanted and be of the highest priority for mitigation.
- Along with existing Kokanee spawning streams, give priority to planting and restoration of the spawning gravel beds in unnamed stream #0143L at Station 464+20. This has been identified by Bill Way as a potential Kokanee recovery stream if given the right culvert and plantings. The County has included an appropriate fish passable culvert, but the stream needs plantings from the mouth at Lake Sammamish and along its stream bed that runs south parallel with the proposed trail. This is a potential real boost to Kokanee recovery here in Sammamish.
- King County and the City of Sammamish should consider mitigation plantings below Ordinary High Water, such as hard stem bull rush, where such plantings are viable, because they help with recovery of the Threatened Chinook salmon. In lake vegetation also provides habitat for Kokanee and salmon by protecting both species from predators while they are in their infancy.
- Tree replacement should be at the higher multiples per our new code. Any trail width will impact trees, including heritage trees. The only way we keep from further degrading our tree canopy is to get replacement trees that are native to the great Northwest.
- A final suggestion for City/County is to have the County agree to participate in the Urban Forestry program that the City develops by providing locations for volunteer tree planting.

5. CONCSISTNECY WITH SHORELINE MANAGEMENT ACT AND LOCAL SMP

RCW90.58.020 "The legislature declares that the interest of all of the people shall be paramount in the management of shorelines of statewide significance. The department, in adopting guidelines for shorelines of statewide significance, and local government, in developing master programs for shorelines of statewide significance, shall give preference to uses in the following order of preference which:

- (1) Recognize and protect the statewide interest over local interest;
- (2) Preserve the natural character of the shoreline;
- (3) Result in long term over short term benefit;
- (4) Protect the resources and ecology of the shoreline;
- (5) Increase public access to publicly owned areas of the shorelines;
- (6) Increase recreational opportunities for the public in the shoreline;
- (7) Provide for any other element as defined in RCW 90.58.100 deemed appropriate or necessary."

The trail represents public use of public property to provide recreational opportunities, non-motorized transportation connectivity and public access to the Shoreline and visual access to waters of the State of Washington consistent with State law. I think that developing the historic rail transportation corridor as a public recreational walking and biking facility, consistent with modern design standards, carries out the State Shoreline guidance provided by the State Legislature that "The legislature declares that the interest of all of the people shall be paramount in the management of shorelines of statewide significance." **RCW 90.58.020**

Particularly as you go down this list of guidelines, increasing public access to publicly owned areas of the shorelines and increasing recreational opportunities for the public in the areas of the shoreline, support trails in general and the completion of segment 2B of the East Lake Sammamish trail, as designed and including required mitigation is consistent with the Legislative guidance.

6. SEGMENT 2B DESIGN NEEDS TO PROVIDE ACCESS FOR ALL PARTIES WITH EASEMENTS TO WATERFRONT

I request that both the City and County acknowledge that not only lakeside residents have existing easements and property rights along Lake Sammamish. Sammamish resident Mary Wictor is providing the legal documents that confirm that platting of many of the hillside subdivisions above the lake were provided with easements to access lakeside properties. I request that the design of Segment 2B include gates/ access so that existing access easements, granted to upland property owners, can continue to be used.

7. TRAIL PLUS TWO FULL SERVICE TRAIL HEAD/PARKING LOTS IS HUGE PUBLIC ASSET

The King County Parks design for segment 2B includes a trail head with parking for 28 cars at the bottom of Inglewood Hill Road. This trail head will include access for all trail users including handicapped residents and visitors as well as the many families here in Sammamish. Sammamish residents will also have access to a future parking lot and handicap access ramp to the East Lake Sammamish Trail across from the 7-11. This parking lot along with the detailed plans we have for the Inglewood Hill Trail head and the current City of Sammamish Park at Sammamish Landing will provide close to 100 parking spaces for residents to use for access to the regional trail. The two

proposed King County Parks trail heads with parking and bathrooms along with the City of Sammamish Parks Sammamish Landing facility will give residents of the City and the Region with a tremendous passive and active park system and link to the region.

8. SEGMENT 2B DESIGN INCLUDES KOKANEE CULVERTS – NEEDED BY FALL 2018

I request that the City of Sammamish move to approve the Shoreline Permit for segment 2B so that the project can be constructed, including the fish friendly culverts for Zaccouse and Ebright Creeks during the summer of 2018 in time for the fall return of the Kokanee. The City Council has directed over a million dollars to improving fish access under the East Lake Sammamish Parkway. It would be a shame if the County cannot construct and have in place the two fish passable culverts in place for the fall 2018 Kokanee spawning season.

9. CITY CAN SUPPORT PLANNED TRAIL ACCESS BY ADDING SIDEWALK ON THOMPSON ROAD

Thank you to King County Parks for adding a trail at Thompson Road in the 60% plan sets. Thompson Road is becoming a key bike and walking access to the trail and the plateau.

Thank you for the opportunity to comment on the Shoreline Permit for Segment 2B of the East Lake Sammamish Trail. This project, will complete and connect a regional trail network that will have a large long term benefit to Sammamish residents and residents of the region.

Mark Cross,



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