

August 12, 2016

Tom Slocum Chair, SRFB Review Panel Recreation and Conservation Office PO Box 40917 Olympia, WA 98504-0917

Re: San Juan County WRIA 2 Lead Entity, Zylstra Lower Lake Acquisition, #16-1293.

Dear Chairman Slocum,

We are very surprised and disappointed with the negative post-application review panel comments received on Zylstra Lower Lake Acquisition Project #16-1293. This project received support for early action funding from the WRIAII Salmon Recovery Technical Advisory Group and Citizens Advisory Group (SJC MRC) along with support from the Lead Entity. This project directly addresses recovery of anadromous fish in one of the few freshwater systems available for salmon restoration in the San Juan Islands. One of the TAG tenets for freshwater restoration is sufficient and year-round flow for salmonids. The project lays the restoration cornerstone, protection of the water supply and securing the most senior water right in one of the largest watersheds in the San Juans. Secured flows for salmonids will set the table for the restoration of False Bay Creek downstream of Zylstra Lake.

The review panel comments appear inconsistent with SRFB funding that was previously made available for the successful acquisition/protection of the Cascade Creek riparian zone (Project #15-1300), along with replacement of a blocking culvert with a bridge at the mouth of Cascade Creek (Project #07-1539). The State secured in-stream flow in Cascade Creek with the purchase of water rights as well. Similar to Zylstra Lake, Cascade Creek maintains a year-round stream flow because of the dam at Mountain Lake which creates sufficient water to ensure that year-round flow supports salmon. The Zylstra Lower Lake Acquisition Project presents a similar situation with its dam/reservoir and intention to release water to False Bay Creek to maintain year-round instream flow. Additionally, False Bay Creek, unlike Cascade Creek, which has natural barriers, provides several miles of potential anadromous fish habitat that can be restored once water rights and management of the reservoir are secured.

In item #1, "acquiring and maintaining an artificial lake is contradictory to salmon recovery efforts to restore natural processes." There is much work on the east side of the Cascades to look at reservoirs as a potential source of summer low flows, those flows that are disappearing with declining snow melt. We have to be realistic that the future will include "unnatural" tools for salmon recovery.

In item #2 of the letter, the initial review panel comment is restated that the project sponsors should instead remove the dams and recreate a wetland. Per our previous comments, and based upon pre-dam aerial photos, no significant wetland existed at this site [B.C. Pratt. (March 2016) Zylstra Lake History]. Creation of a wetland at this site would not be restoration.

Historically, this watershed supported perennial flow at False Bay Creek [B.C. Pratt. (March 2016) Zylstra Lake History]. The watershed now provides drinking water to Friday Harbor (a junior water right to Zylstra Lake), and the watershed also has several in-channel ponds. The watershed hydrology has been fundamentally changed from historic conditions. The water volume in a new (non-historical) wetland would not be adequate to sustain year-round instream flow. The only way to secure adequate year-round flows for salmonids is proper flow management of Zylstra Lake. False Bay Creek is a rain-dominated watershed; it receives its input solely from precipitation that is either captured in ponds and lakes for later summer use, or runs directly into the sea.

Furthermore, concern about warm stream water affecting the nearshore marine environment in False Bay is misplaced. Restored False Bay Creek in-stream flow will seep into the tideflats at the head of False Bay in a very localized site which experiences solar heating twice daily to temperatures as high and higher than stream water temperatures. Stream flow will not significantly increase these temperatures. The University of Washington, Friday Harbor Laboratories (FHL), which owns and manages the False Bay Biological Preserve has not identified this as a significant concern. They have opined that increased freshwater input is likely to benefit eelgrass meadows degraded by seagrass wasting disease. Moreover, FHL has carefully reviewed and fully supports the Zylstra Lower Lake Acquisition Project.

Nor should predation by introduced species be a problem. Prior to re-introduction of anadromous fish into the watershed, bass populations will be eradicated in Zylstra Lake.

Zylstra Lower Lake Acquisition Project is a unique opportunity to restore the ecological services of anadromous fish to the False Bay Creek watershed; services that have been denied for many decades due to past land use practices, and will only be restored if Zylstra Lake and its water supply are secured.

Please let us know if we can answer any additional questions or provide more information.

Thank you for your serious consideration of this unique opportunity to restore freshwater anadromous fish habitat in San Juan County.

Sincerely,

Tim Seifert

Executive Director