

# Salmon Creek Watershed Council

## Our Mission:

To inspire and facilitate community investment in the Salmon Creek Watershed for the protection and enhancement of its natural resources.

September 22, 2006

Ron Price  
Pleasant Highlands Neighborhood Association  
4513 NE 137<sup>th</sup> St  
Vancouver, WA 98686

Dear Ron,

The Board of the Salmon Creek Watershed Council would like to state our position on the Environmental impacts of Alternative 2 and Alternative 3 Sub-areas to the Salmon Creek Watershed.

Salmon Creek and its tributaries support three species of Salmonids: Coho salmon, winter-run steelhead, and coastal cutthroat trout. The Washington Department of Fish and Wildlife classifies populations of Coho and steelhead in Salmon Creek as "depressed". The cutthroat trout population is also assumed to be depressed.

Human activities in the Salmon Creek watershed have resulted in significant changes to its vegetation, land use, and hydrologic characteristics. One result of these changes is increased stream temperature. Though specific temperature requirements vary between species and from one life stage to another, Salmonids as a group tend to be among the most temperature-sensitive biota in Northwest streams.

Thermal impacts that increase fish mortality begin to occur at stream temperatures greater than 64°F, including a decrease in energy for feeding and growth, increased exposure to pathogens, decreased food supply, and competition from warm-water species. As temperatures rise past 70°F, physiological processes are affected and mortality may occur within a few days or even hours. Stream temperature is therefore a vital consideration for the maintenance and recovery of salmon, steelhead, and other cold-water species.

Streamside vegetation removal, channel modification (widening), and impoundments (ponds) are mechanisms by which increased heating of water may occur. Low summer flows, due to surface water withdrawals, insufficient recharge of shallow groundwater, or drought also contribute to elevated water temperatures

Salmon Creek currently exceeds state and federal standards for water temperature, turbidity, and coliform bacteria. Salmon Creek is on the Department of Ecology's list of Washington's polluted rivers. 1000 Friends of Washington has named it one of Washington's 10 most endangered places.

A variety of human activities, including development, the day-to-day activities of residents, threaten the health of Salmon Creek. A growing population compounds the problem. Some sources of pollution include failing septic systems, pet and livestock waste, pesticides and fertilizers from residential and agricultural use, and oils and other toxins from motor vehicles. Aquatic life is threatened by polluted stormwater runoff from fields, roads, roofs, and parking lots, and by exposed soil that erodes into the stream.

Because Salmon Creek is fed from rain and groundwater sources, the amount of water in the creek is significantly lower in the summer than in the winter. Any direct withdrawal of water from Salmon Creek for irrigation or other uses, legal or illegal, also lowers stream flows. Septic system contamination that reaches Salmon Creek during the low-flow months can create conditions that are especially detrimental to juvenile fish; it also poses a health risk for people who have contact with the water.

In an interagency temperature survey of the Salmon Creek Watershed completed in 2003 by Clark County Water Resources and Clark Public Utilities, 12 of 15 stations monitored during summer 2003 failed to meet current and proposed state water temperature criteria (Schnabel, 2003). Temperatures regularly exceeded thresholds for detrimental thermal impacts to rearing Salmonids. The state agency in charge of setting environmental regulations, Washington Department of Ecology, has set 64°F as the maximum temperature to protect streams with salmon (Ecology reference from Jeff's report?). Within Salmon Creek, temperatures exceeded the 64°F standard for protecting salmon and sensitive aquatic life at 12 of 15 stations over a 35 day period and some sites temperatures exceeded 70°F lasting 1 to 6 weeks. According to the study, stream temperature should be considered a limiting factor for Salmonid rearing in the Salmon Creek watershed. Salmon Creek and its tributaries have been tested for water chemistry, streambed life, bacteria and general water quality including temperature, pH and dissolved oxygen. Even though only 30% of the watershed has been tested, only a small portion of the stream is rated as being in "good" overall health, with 15% being in "poor" and 2% being in "very poor" condition (cite the Clark County Streamhealth Report). *70% of the watershed was unassessed in the study and may have significant water quality and habitat issues.*

The Salmon Creek Watershed Council (SCWC) is concerned about the potential negative impacts of GMP alternatives 2 and 3 on the sensitive Salmon Creek watershed. Salmon Creek has already endured significant growth related degradation, perhaps more than any other Clark County waterway. Clark County Public Works and Clark Public Utilities have invested a significant amount of money and effort to mitigate for, or prevent further sedimentation, erosion, and pollution of this stream.

Specifically, SCWC believes that creating a large commercial and mixed use hub at the corner of 50<sup>th</sup> Ave and 139<sup>th</sup> Street would greatly negate any progress made, and would be a final and significant blow for what was once an amazing fish passage and habitat corridor.

The SCWC urges the commissioners to adopt a plan that recognizes the potential impacts to the Salmon Creek Watershed, and works to preserve and enhance those areas that are important from a habitat and water quality perspective.

Thank you,

Randall Pearl  
On behalf of the Board of the Salmon Creek Watershed Council.