

## BAINBRIDGE ISLAND LAND TRUST

March 16, 2020

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RE: PLN50280C SSDP and SVAR

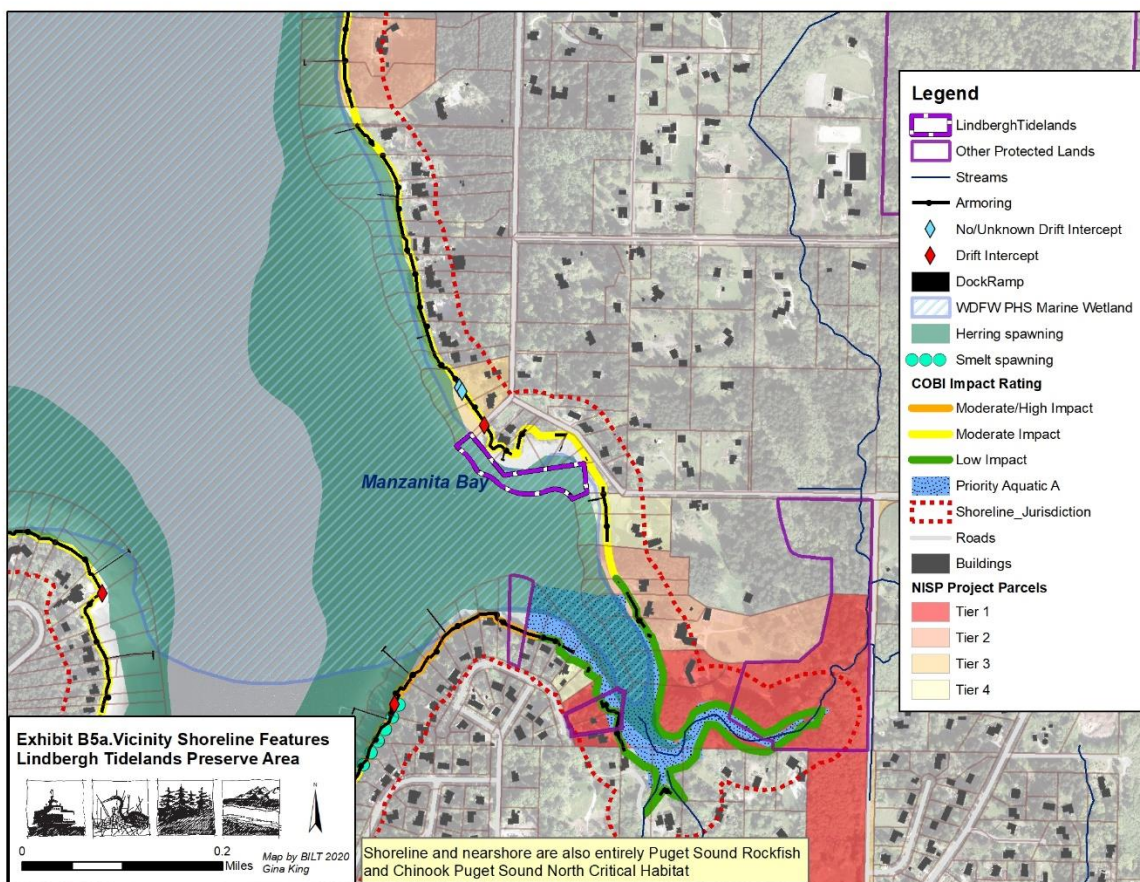
Bainbridge Island Land Trust (Land Trust) provides the following comments on PLN50280C SSDP and SVAR, a proposed new dock in Little Manzanita Bay. We submit these comments as adjoining landowners to the proposed new dock, and as a party of interest in the Little Manzanita Bay area. We trust the information provided will be valuable to the City of Bainbridge Island, the Hearing Examiner, and the Washington Departments of Ecology, Natural Resources, and Fish and Wildlife as evaluation of the proposed new dock takes place.

Bainbridge Island Land Trust is a non-profit conservation organization dedicated to conserving important natural places on Bainbridge Island for the benefit our community and wildlife species. In our 31 year history, we've assisted, with the help of many landowners and other organizations, in protecting over 1400 acres that are both ecologically significant as well as important community spaces such as Agate Passage Preserve, Cougar Creek Preserve, Gazzam Lake Preserve, Blakely Harbor Park. Protection and improvement of our Island's 53 miles of shoreline is a high priority for the organization, as specified in our 2018 Strategic Conservation Plan and guided by regional multi-partner prioritization efforts. In addition to protection projects, the Land Trust has worked on shoreline restoration projects, including the Powel Shoreline Restoration Project which removed nearly .25 miles of armor from the shore in order to restore natural function of the shoreline, and improve associated riparian habitat processes and conditions. Our nearly 1700 household members and our community entrust us to care for the lands we've protected and be stewards of our Islands resources.

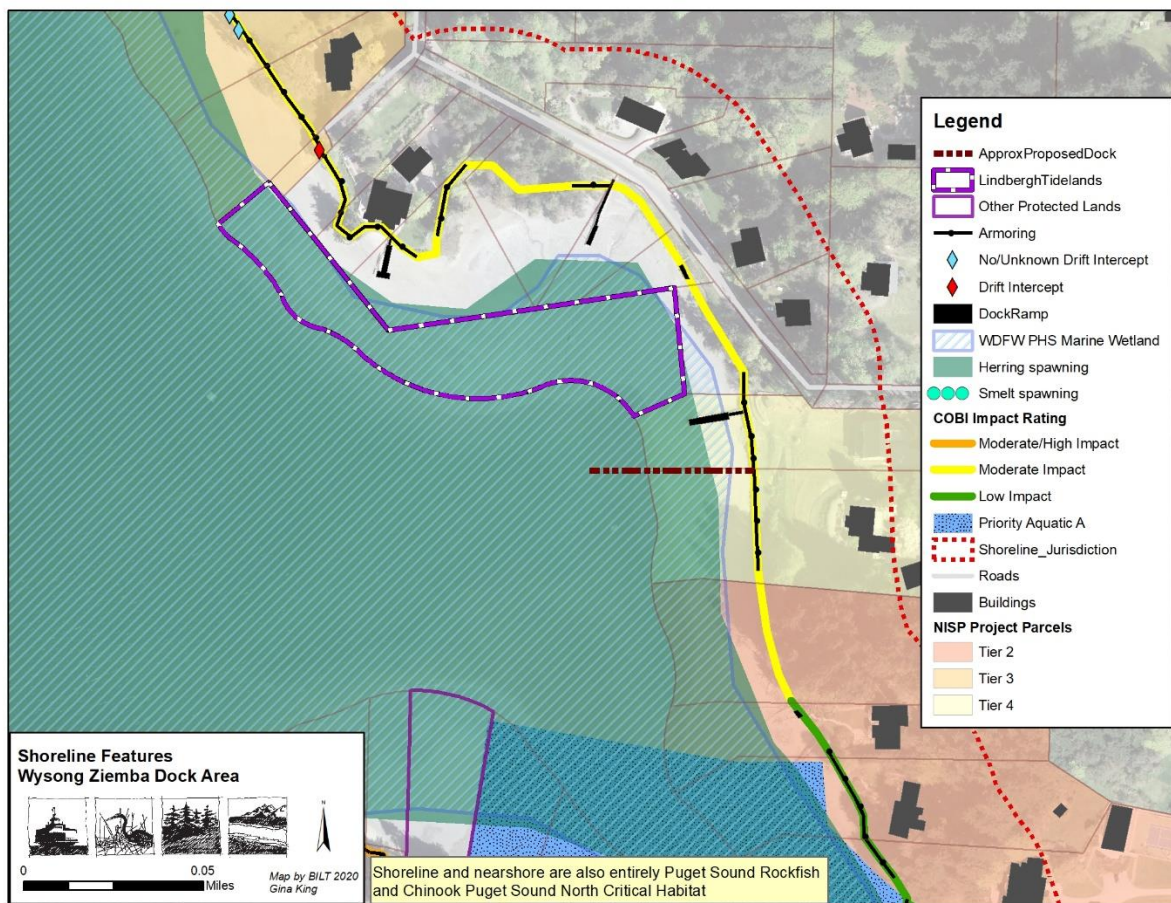
The Land Trust owns tidelands, Kitsap County tax parcel 092502-2-037-2009, adjacent to the proposed

new dock. This parcel was donated to us for conservation purposes, and we call this the Lindbergh Tidelands Preserve. Additionally, we own the 13.27 acre Miller-Kirkman Preserve at the head of Little Manzanita Bay (which contains stream, tideland, wetland, and upland habitats), and, hold a donated conservation easement on a parcel on the south shore of Little Manzanita Bay. The inserted maps below illustrate our current holdings in Little Manzanita Bay in proximity of the proposed new dock. Additionally, we are working on two other protection projects in Little Manzanita Bay – a donated conservation easement and a purchased preserve.

Little Manzanita Bay is a priority area for Land Trust work because of its important natural attributes and the habitats contained within the bay, estuary, Manzanita Creek and associated uplands. These are attributes that have been recognized not just by us, but regionally. The Land Trust was recently granted over \$700,000 in state Salmon Recovery Funding Board funds to acquire preserves in this area as it is an area of statewide significance for Puget Sound salmon recovery priorities.







All of Bainbridge Island's 53 miles of shoreline are federally-designated Critical Habitat for Chinook salmon and for Puget Sound Rockfish. The shoreline and nearshore environment of Puget Sound provides important habitat for many life stages of Chinook salmon as well as other salmon species such as Coho, which have a documented presence in Little Manzanita Bay.

Juvenile Chinook, federally listed under ESA, are considered the most dependent among salmon species on estuary and marine nearshore rearing habitats (Healey 1982, Fresh 2006). During their early life history, juvenile Chinook tend to remain in close proximity to the Puget Sound shoreline, then move into deeper habitats as they grow larger (Fresh 2006). Their affinity for shallow nearshore habitats is understood to reduce their vulnerability to predation by larger fish and allow them to forage in the productive shallow water habitats. Modifications to estuarine and nearshore habitats have reduced their productivity and impacted juvenile Chinook fitness and survival. Chinook salmon are the primary food source for federally endangered Puget Sound populations of Orca whale. An immense amount of past and present work and public investment by governments, tribes, non profits and community groups supports recovery of these iconic species of Puget Sound, and the food sources and habitats they rely on.

The above maps also illustrate designations within Little Manzanita Bay such as Washington Department of Fish and Wildlife Priority Habitat (Marine/Wetland) and spawning habitat for herring - an important food source for Chinook salmon. Herring populations are depressed in Puget Sound. A portion of Little

Manzanita Bay just 400' south of the proposed dock is a COBI-designated Priority Aquatic Category A area based on existing natural state and sensitivity to development, and the shoreline designation there is Shoreline Residential Conservancy. This affords a higher level of protection for sensitive shoreline areas.

A number of assessments and studies have identified Little Manzanita Bay as a priority for protection (where features are intact) or restoration (where improvement of conditions is desirable). The Bainbridge Island Nearshore Habitat Characterization Assessment (Williams et al 2004) helped lead to the COBI-designated Priority Aquatic Category A area based on existing natural state and sensitivity to development. This inlet received a shoreline impact rating of Low in the City of Bainbridge Island's Nearshore Assessment. The Bainbridge Island Current and Historic Coastal Geomorphic/Feeder Bluff Mapping (Coastal Geologic Services 2010), Strategies for Nearshore Protection and Restoration in Puget Sound (Cereghino et al 2012) and the 2017 West Sound Nearshore Integration and Synthesis of Chinook Salmon Recovery Priorities (just to name a few of many studies) identified the Little Manzanita Bay area a priority project area, with many individual parcels identified for protection and or restoration in order to meet Chinook salmon recovery goals. The Nearshore Integration Synthesis identified multiple clustered parcels, including the tideland parcel now protected as the Land Trust held Lindbergh Tidelands Preserve, and the Miller-Kirkman Preserve, as Tier 1 for protection, and several additional parcels in the Manzanita Bay area are ranked Tier 2-4 (see above maps) for either protection or restoration. Shore armoring degrades habitat for small fish and disrupts the natural erosion processes that keep beach habitats healthy; many of the Tier 2-4 projects identified in this area were for removal of armor and other structures on the shore.

Manzanita Creek is the only creek on Bainbridge Island where adult salmon have been observed during the past two years (2018 and 2019) of salmon surveys performed by Bainbridge Island Watershed Council. Manzanita Creek is generally the coldest salmon-bearing stream on the Island<sup>1</sup>. WDFW Salmonscape and observations by Wild Fish Conservancy and the Bainbridge Island Watershed Council (Watershed Council) confirm that Manzanita Creek and tributaries are used by Coho, cutthroat trout, and chum, so these fish pass through the tidelands of the proposed dock area at least as spawning adults and as out-migrating juveniles.

One of the City's 16 water quality monitoring sites is near the outlet of this system on the Miller Kirkman Preserve, and water is sampled at this site monthly. Kitsap County also manages a continuous flow sampling gauge on the Preserve and flow data are available at [http://kpudhydrodata.kpud.org/MZ\\_Recorded\\_Conditions.aspx](http://kpudhydrodata.kpud.org/MZ_Recorded_Conditions.aspx).

Many very small fish fry of unidentified species have been observed in the shallow water channels on our tidelands during May and August visits, and these may have been herring or smelt. The WDFW PHS mapping shows a couple of stretches of known smelt spawning in the area: one about 1,200 feet south of our tidelands across the mouth of Little Manzanita Bay, and another about ½ a mile to the north. Perhaps the City's past but long term beach seining study identified more species in this area.

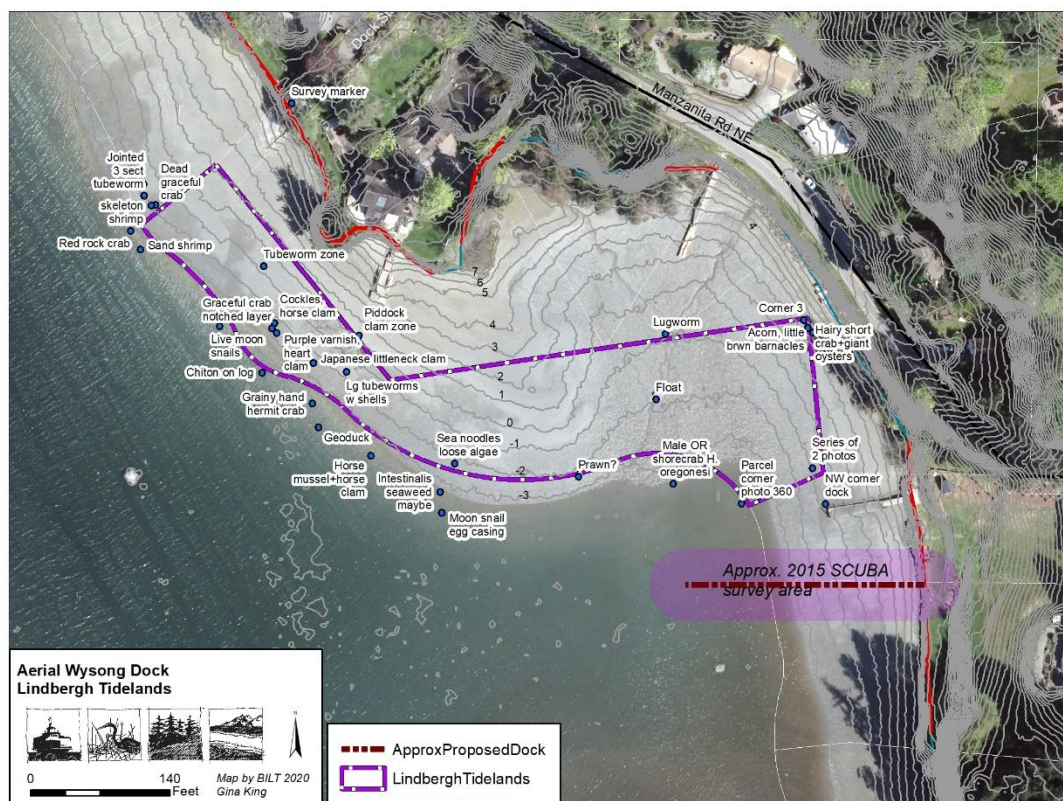
Although the development proponents' 2015 SCUBA survey of the tidelands and subtidal area found the only macroalgae species present to be the red sea noodle *Gracilaria* species, and other species to include

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<sup>1</sup> City of Bainbridge Island: State of the Island's Waters, 2<sup>nd</sup> Edition – 2019.



crabs and clams, our surveys of our adjacent tidelands have found an abundant diversity and density of marine life in this area. Over 40 species of low-mobility plant and animal species have been observed on 3 biological inventory surveys in 2017 and 2019, and the many additional bird and marine mammal species making use of this beach vary with the tides and season. Groups of raccoons and up to 7 river otters have been captured on our trail cameras just up the estuary on our Miller Kirkman Preserve and undoubtedly forage along this shore as well. Birds such as great blue herons, osprey, bald eagles, and belted kingfishers are often seen from the tidelands, and numerous waterfowl and shore birds undoubtedly take advantage of the abundant forage of plants and animals occupying this beach. Species observed on the tidelands include 22 species of mollusks, including clams and mussels such as paddock clams (concentrated in clay soil areas), geoducks, littleneck clams, and horse clams, and snails such as periwinkles and Lewis's moonsnails (including live snails and egg casings, and circular holes indicating moonsnail predation on many clam shells). Other animal species include giant California sea cucumber, 2 species of hermit crab, red rock crabs, sand and skeleton shrimp, multiple barnacle species, and a remarkably high density of tubeworms in the lowest zones. Plant species include green and red seaweeds, twisted sea tubes, and "sea noodles" (*Gracilaria* species). Although eelgrass is not present, these other species may be used by herring as a substrate for egg laying.



A 2010 analysis mapped feeder bluffs and prioritized restoration and conservation shoreline sites and reaches. This analysis found substantial alteration of coastal processes on the Island, determining that

Bainbridge Island shorelines have lost 60% of their sediment supply due to armoring and other shore modifications<sup>2</sup>. The net shore drift direction along our Lindbergh Tidelands Preserve was identified as flowing from north to south, and this is not an accretion shoreform or feeder bluff area. Its drift cell (KS-13-2) stretches from just southeast of the Preserve (near the proposed new dock site) to 2,000 feet north and was modeled to have suffered among the highest percent losses of nearshore sediment sources, at 85% loss. This leads to erosion and “sediment starvation”<sup>1</sup>. This drift cell was ranked as 3<sup>rd</sup> highest priority on the Island for restoration by this 2010 analysis.

Docks can have negative impacts on sand and sediment movement as well as on fish movement, as many fish avoid shaded areas. As with armored shores, small fish swimming into deeper water to avoid an area shaded by a dock may be eaten by predators. Another impact of docks comes from increased risk of pollutants such as marine fuel or sewage from the docked boats as well as materials such as Styrofoam and tire debris from aging docks and creosote from treated pilings. Creosote causes high mortality and developmental abnormalities in herring eggs. The concentration of docks and pollution inputs at marinas are particularly impactful to shorelines.

Section 5.3 of the Shoreline Management Plan addresses boating facilities. Section 5.3.2 Goal states that “[b]oating facilities, including marinas and boat launch ramps, are priority water-dependent uses” but should “avoid and minimize adverse effects on shoreline functions and processes”. Boating facilities are not allowed in the Priority Aquatic area that begins 400’ south of the proposed new boat dock, but are allowed outside of that designated area in Manzanita Bay. Specific policies in section 5.3.3.1 state that new or expanded boating facilities should avoid spawning areas for forage fish such as herring. Section 5.3.3.2 also says that boating facilities should be located to minimize adverse effects on shoreline processes such as sediment movement.

It is because of the potential effects on these natural attributes, that we question the ability of the proposed new dock to be done in a way that will not negatively impact the natural resources of Little Manzanita Bay.

Unless a project is either a protection or a restoration project on Little Manzanita Bay, we question how any such project can align with the goals and commitment of Washington State to recover listed species and/or comply with the City of Bainbridge Island’s shoreline protection regulations.

The existing dock (on the Ziemba parcel) is an 83’ dock and ramp, including an opaque 8 X 62-foot floating dock (496 square feet) supported by creosote-treated wood pilings and 108 rubber tires that ground out at low tide. We agree that this dock should be removed, but instead of being replaced (which actually would be a new dock, not a repair or replacement) by the proposed 240’ long Ziemba/Wysong shared use grated pier, ramp, float, and boat lift supported by steel pilings and float tubes, the existing dock instead could be upgraded so that a boat is not resting on the tidelands, so that the existing undesirable materials are removed from the area, and that the small dock, in the same location or smaller location, can be shared.

The proposed new dock as described in the applicant’s materials pertaining to PLN50280C SSDP and SVAR does not seem to align with regional thinking on the care of Puget Sound shorelines, tidelands,

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<sup>2</sup> Coastal Geologic Services Inc. 2010. Bainbridge Island Current and Historic Coastal Geomorphic/Feeder Bluff Mapping. Prepared for City of Bainbridge Island Planning and Community Development. April 22, 2010.

estuaries, and associated uplands. The proposed dock also encroaches on publicly owned Washington Department of Natural Resources aquatic lands, and yet the dock would be reserved for private use.

We ask the City, and Washington Departments of Ecology, Natural Resources, and Fish and Wildlife to take a very close look at the new dock proposal and how it appears to be disconnected from the regional and local priorities to protect the fragile and threatened nearshore and estuary environments of Puget Sound, and therefore, threaten the species that rely on this environment.

cc:

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Washington Department of Natural Resources: Hilary Franz, Solenne Walker

Suquamish Tribe: Leonard Forsman, Alison Osullivan, Tom Ostrom

Washington Department of Ecology: Laura Watson, Colin Hume