

Lake Washington Ship Canal Project Master Plan Environmental Assessment 2026

EAXX-202-00-G3P-1735821983

Appendix E - Public Comments and Responses



March 24, 2025

Kaitlin Whitlock
U.S. Army Corps of Engineers
Attn: Planning, Environmental, and Cultural Resources Branch
4735 E. Marginal Way S. Bldg. 1202
Seattle, WA, 98134-2388

Dear Ms. Whitlock:

Thank you for the opportunity to provide comment on the Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the Lake Washington Ship Canal (LWSC) Project Master Plan. An update to the 1994 LWSC Master Plan is long overdue. Since the 1994 Master Plan was produced, Puget Sound Chinook have been listed as Threatened under the Endangered Species Act (ESA), steelhead are now functionally extirpated from the watershed, and sockeye salmon populations have plummeted. I understand the purpose of the LWSC Master Plan is to guide the U.S. Army Corps of Engineers (USACE) to preserve, conserve, restore, maintain, manage, and develop USACE project lands and resources. This includes management of the Locks fish ladder plaza and viewing window. While conditions at the Hiram M. Chittenden Locks (Locks) and in the LWSC present key constraints to salmon migration and survival, I understand the LWSC Master Plan does not cover operations and maintenance of the Locks and fish ladder, water quality, or salmon predation.

The Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council (Council) submitted a comment letter to USACE responding to a request for input on the scoping of the LWSC Master Plan on July 30, 2020. This letter reiterates some of the same topics included in the 2020 letter. The WRIA 8 salmon recovery partnership is comprised of 28 local governments and representatives from businesses, community groups, concerned citizens, and state and federal agencies working collaboratively since 2000 to recover Chinook salmon. The WRIA 8 Council guides implementation of the WRIA 8 Chinook Salmon Conservation Plan (WRIA 8 Plan) including habitat goals and recovery actions that support long-term, sustainable, and harvestable runs of Chinook salmon in the watershed. The WRIA 8 Plan is approved by the National Oceanic and Atmospheric Administration (NOAA) as a component of the Puget Sound Salmon Recovery Plan. Although Chinook salmon are our primary focus, many of our objectives are intended to benefit other salmonids including coho, sockeye, and steelhead.

The Locks and LWSC are essential to our region's economy, transportation, and salmon recovery efforts. Improving salmon habitat conditions at the Locks and LWSC is of paramount importance to recovery efforts in the WRIA 8 watershed. Every salmon in WRIA 8 must pass through the Locks and LWSC twice in its life, both as a juvenile migrating out to the sea and as an adult returning to spawn. Recovering sustainable and harvestable salmon populations, supports local, state, and federal investment of more than \$130 million in habitat restoration since 1999 and will increase numbers of Chinook salmon – the primary food source of endangered Southern Resident orca.

The following comments on the draft EA for the LWSC Master Plan focus on the elements related to supporting salmon health and survival, including planning, land and resource management, and outreach programming.

General Comments

- The EA's analysis of Alternative 3 (maximizing natural resource preservation) does not adequately document or explain why this approach would not meet the purpose and need. The importance of the public's interest in outdoor recreational opportunities does not preclude maximizing natural resources on Project lands.

Response: Thank you for providing comments. Alternative 3 (Maximizing Natural Resource Preservation) does not meet the purpose and need because it would not be a multiuse approach to USACE project land management between public use and natural resource preservation. The purpose of Master Plans is multifaceted: "...to guide USACE to preserve, conserve, restore, maintain, manage, and develop USACE project lands and associated resources in accordance with USACE guidance" (section 1.3 of the draft EA). Public use is an integral part of the LWSC Project, and that is reflected by maintaining public use areas. Instead, Alternative 2 allows USACE to aim for multiple objectives of natural resource preservation while maintaining public use.

- In the project-wide objectives, the emphasis in objectives number 3 - preserving and enhancing fish and wildlife habitat on LWSC Project land and objective 4 – establishing and maintaining coordination with partners and developing partnership, are particularly important for salmon recovery efforts. Partnerships with community groups and other entities and jurisdictions with relevant habitat restoration experience can benefit USACE land management.

Response: Thank you for highlighting this connection to salmon recovery efforts. Developing an LWSC partnership guide will benefit overall partnering actions and helps connect USACE to groups with relevant expertise for management actions that align with salmon recovery efforts, USACE guidance, and funding opportunities.

- The objective that proposed to be removed under Alternative 2, which calls for cooperation with fish and wildlife agencies in controlling nuisance wildlife and plant species should be

retained, rather than be eliminated as proposed. The Draft EA suggests these objectives are redundant to the other objectives but given the magnitude of the impact of predation from invasive predatory fish in the Ship Canal and pinnipeds at the Locks, as well as the impacts from land-based invasive species like Himalayan blackberry and knotweed, the USACE should consider retaining this objective.

Response: Restructuring the Master Plan to remove redundant or narrow objectives retains similar opportunities for cooperation with natural resource agencies. USACE policy, funding, and available partners are other factors guiding USACE cooperation with natural resource agencies. Since the previous Master Plan was created in 1994, USACE has cooperated with fish and wildlife agencies in controlling nuisance wildlife and plant species through other objectives. For example, USACE used the following project-wide resource objectives, “(1) To protect, preserve, and conserve the LWSC Project's natural and cultural resources to ensure their continued availability for use, enjoyment and recreation by present and future generations” and “(4) To establish and maintain close, ongoing coordination with interested Federal, State and local agencies, and citizen groups and organizations in managing the natural and humanmade resources and cultural features associated with the LWSC Project” to guide a study on acoustic deterrence of pinnipeds that was supported by natural resource agencies.

Salmon Habitat and Migration

- The proposed action to develop a Project-wide Vegetation Management Plan to coordinate all vegetated areas under a single plan is a good approach. However, management and restoration strategies should use best management practices and be flexible to tailor planting and maintenance plans to the specific land classification for individual parcels. As noted in the EA, a VMP would also improve coordination with neighboring property owners and managers, like Seattle Parks and Recreation and the University of Washington.

Response: Thank you for identifying a key component to the VMP. The VMP is intended to be a living document that is revised as needed with lessons learned and updated conditions.

- The EA does not consider the need and opportunity to address impacts of artificial light at night on aquatic resources, including migrating juvenile and adult salmon. The LWSC Master Plan should employ actions focusing on commonsense reductions in nighttime artificial lighting at the Locks and throughout the LWSC to reduce non-target, unintentional, and often unnecessary impacts of light pollution on salmon and other biological resources.
- The EA does not adequately consider the opportunity to manage Project lands in a manner that supports improved water quality by identifying opportunities to manage stormwater flows from and through those lands to the LWSC. The LWSC Master Plan should include provisions to seek and consider multiple benefit actions that can both manage/restore habitat and stormwater runoff.
- The EA suggests Alternative 2 could benefit water quality by providing increased shading and reducing turbidity by using BMPs, but it does not explicitly identify specific actions in Alternative 2 that should be used to improve water quality conditions for migrating salmon. The LWSC Master Plan should prioritize increasing natural habitats and engineered habitat enhancements (e.g., overhanging vegetation) along the shores of the LWSC and downstream of the Ballard Locks to improve habitat and water quality conditions for migrating juvenile and adult salmon.

Response: Thank you for sharing the above resource concerns. The purpose of the LWSC Master Plan is to guide USACE to preserve, conserve, restore, maintain, manage, and develop USACE project lands and associated resources in accordance with USACE guidance rather than prescribe specific management actions for natural resource management improvement. Proposed resource objectives support the identification of project or management opportunities for artificial light at night, stormwater management, and water quality improvements as part of coordination with other parties or as part of USACE management for ESA-listed species.

Outreach and Monitoring Salmon Populations

The Locks serve as an important facility for educating local residents and visitors about salmon biology and recovery efforts. Annually, more than 1.25 million people from across the globe visit the Locks and LWSC, making them one of the top tourist destinations in the greater Seattle region and an invaluable site for public education. The LWSC Master Plan should highlight the continued important educational function of the Locks and LWSC, including:

- The EA acknowledges the outreach and education resources and opportunities at the Locks and LWSC, and the need to more effectively count visitors. This would help better document visitation, but it is also important to understand why people visit and what they value about the USACE Project lands and resources.
- The EA notes that Alternative 2 provides an approach to more effectively accommodate visitors while preserving natural resources. While developing a strategy to manage visitation to preserve natural resources is critical, the Locks and LWSC offer a unique

opportunity to also engage visitors in understanding the importance of natural resources, like salmon, and what they can do individually to support salmon survival. To this end, the LWSC Master Plan should include actions that:

- Continue and enhance coordination with partners (tribes, community groups, local governments, etc.) to enhance outreach and education resources and programming.
- Improve outreach and education facilities to enhance visitor experience and educational opportunities, such as the current effort to upgrade the fish ladder viewing window area and fish ladder plaza, and to better integrate displays and information at the Visitors Center with the fish viewing window.
- Continue to support and grow partnerships with outreach and education programs at the Locks.

Response:

Understanding visitor use of the LWSC Project is critical for an appropriate natural resource interpretation program. A comment card program is used throughout USACE to obtain visitor feedback associated with recreation areas and visitor groups of interest to project managers. Results of a survey of project natural resource managers conducted in 2000 indicated that the comment card program was considered by project managers to be the most important source of visitor data for identifying recreation management needs on Corps projects. Since 2000, the comment card program has been further evaluated and modified into the current practice, which entails mandatory comment card surveys every three years using a standardized comment form. More information about the comment card program is available online: <https://corpslakes.erc.dren.mil/employees/commentcard/commentcard.cfm>

Coordination with partners and stakeholders on topics listed above greatly improves visitor experiences offered at the LWSC Project. The volunteer and partnership programs are closely related and there will be comprehensive guidance on both. In addition, a Seattle District-wide effort is planned to develop an overarching volunteer policy. USACE has robust partnership and volunteer programs currently with The Corps Foundation, which is the largest cooperating association working with the Corps. Discover Your Northwest is interfacing with the LWSC Project daily and on some larger projects such as fish ladder interpretive displays and kiosk content on salmon. Future developments and coordination with other partners and stakeholders will be guided by the volunteer and partnership programs, USACE policies, funding, and coordination with local partners.

Thank you for the opportunity to comment on the Draft EA for the LWSC Master Plan. We appreciate USACE's ongoing partnership in recovering salmon in WRIA 8, and we strongly support USACE in developing, updating, and annually requesting funds to implement a comprehensive suite of prioritized Locks and LWSC Project land and resource management projects, and outreach and education resources and programs. We look forward to continued coordination to improve salmon survival and migration and enhance education and outreach programming to raise public awareness of salmon as an important natural and cultural resource at the Locks and LWSC.

Sincerely,

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Jason Mulvihill- Kuntz
WRIA 8 Salmon Recovery Manager



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