

Debbie Beadle

From: Evan Maxim
Sent: Tuesday, March 12, 2013 1:55 PM
To: Melonie Anderson; Debbie Beadle
Cc: Kamuron Gurol; Susan Cezar; Kathy Curry
Subject: FW: ECA City Council comment submittal
Attachments: Propst CC1.pdf

Public Comment

*Evan Maxim
Senior Planner
City of Sammamish
425.295.0523*

From: Greg Krabbe [mailto:gkrabbe@comcast.net]
Sent: Tuesday, March 12, 2013 1:56 PM
To: Debbie Beadle
Cc: Evan Maxim; "Brent Carson"; jetosti@msn.com
Subject: ECA City Council comment submittal

Debbie please add the attached to the public hearing record of the City Council ECA review.

Thanks.

*Greg Krabbe
GFK Consulting Inc
425 347 2898*

EXHIBIT NO. CC13

GFK Consulting

Land Development Services

March 12, 2013

City of Sammamish Mayor and City Council

Re: City of Sammamish ECA review- evaluation form 14(g)- the "Carson Proposal"

Mr. Mayor and Council;

I am writing to outline and direct your attention to the work that has been done to support the Planning Commission's recommendations to approve Evaluation Form 14(g) – the "Carson Proposal". Evaluation Form 14(g) concerns a proposed pilot program in the Erosion Hazard Overlay near Sensitive Water Bodies boundary (EHONSWB) to allow three subdivision projects using tight-line technology, advanced treatment and strict construction management techniques, to assure water quality in Lake Sammamish will not be adversely affected by this limited development. According to the City's own consultant, AMEC, this proposal meets current best available science (BAS).

To begin, it is important to note that the EHONSWB was originally promulgated by King County in 1994 at a time when stormwater management and erosion control requirements were inadequate to address stream channel erosion and the potential pollutant loading of Lake Sammamish. Since that time water quality practices and regulations have improved dramatically. As a result of this, Lake Sammamish is currently meeting or exceeding the water quality standards set by King County's Major Lake Monitoring program.

Lake Sammamish's listing in DOE's 303(d) lake water quality survey as impaired for Fecal Coliform; this is a relic of the past practice of dumping raw sewage into the lake and failing septic systems. Developments with access to public sewer systems and treatment do not contribute to Fecal Coliform. Lake Sammamish is not listed as impaired for Phosphorous.

The long term, scientific measurements show us that the lake has remained clean even as development has occurred in the vast majority of the lake basin. This is largely because of the effectiveness of Ecology and King County Stormwater Regulations (BAS, Zisette, CAC #145).

The 14(g) – "Carson Proposal" makes the following recommendations for allowing up to three subdivisions within the no-disturbance area as a pilot program to demonstrate that this development can occur without adverse impacts to water quality:

1. Tight-lining stormwater runoff directly to Lake Sammamish after enhanced water quality treatment (*BAS: AMEC Erosion Hazard Areas & Erosion Hazards near Sensitive Water Bodies; "Wet Season Restrictions"*, DOE Stormwater Management Manual for Western Washington).
2. Limit construction activities to the drier months (*BAS: AMEC Erosion Hazard Areas & Erosion Hazards Near Sensitive Water Bodies; "Erosion Hazard Area Seasonal Clearing Restrictions"*, DOE Stormwater Management Manual for Western Washington, GFK Consulting NPDES evaluation, CAC#201).
3. Installation of permanent stormwater detention and water quality elements prior to any mass grading.
4. Mandatory use of active chemical and mechanical treatment of runoff during construction (*BAS: AMEC Erosion Hazard Areas & Erosion Hazards near Sensitive Water Bodies; "Erosion and Sediment Control Practices"*, DOE Stormwater Management Manual for Western Washington).
5. Installation of advance runoff treatment that would remove at least 60% of total phosphorus (not just suspended) from the water quality design storm (*BAS: Efficiency Assessment of BaySeparator and BayFilter Systems in the Richard Montgomery High School, CAC#260, note; the DOE has several passive water quality treatment technologies listed on their website that achieve 50%+ total phosphorus removal*).

Every one of these elements is based on best available science, policy and practice. As a package, this proposal assures that mitigation measures are in place to reduce any risk to water quality down to negligible levels.

Finally, the 14(g) proposal includes monitoring requirements that will allow the City to make an informed decision about continuing the program. Combined, this program is entirely consistent with the recommendations of GMA.

Thanks for your attention to this matter, please contact me if you have any questions, 425 347 2898.

Sincerely



Greg Krabbe, PE
President