

## Debbie Beadle

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**From:** Evan Maxim  
**Sent:** Friday, May 17, 2013 4:55 PM  
**To:** Melonie Anderson  
**Cc:** Debbie Beadle  
**Subject:** FW: FW: Info Request RE: Erosion Hazard Overlay Sammamish

**EXHIBIT NO.** CC5b.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### Public Comment

Evan Maxim  
Senior Planner  
City of Sammamish  
425.295.0523

Effective March 1st, my email address is: [emaxim@sammamish.us](mailto:emaxim@sammamish.us). Emails sent to my old email address are being forwarded temporarily, however please update your email address for me accordingly.

-----Original Message-----

**From:** Derek Booth [<mailto:dbooth@u.washington.edu>]  
**Sent:** Friday, May 17, 2013 4:27 PM  
**To:** City Council; Evan Maxim  
**Cc:** Kamuron Guroi; Ilene B Stahl  
**Subject:** Re: FW: Info Request RE: Erosion Hazard Overlay Sammamish

Dear Mr. Maxim, the Sammamish City Council, and others--

Thank you for forwarding these documents. As you know, Ms. Stahl contacted me earlier today about the upcoming actions being considered by the City Council. She correctly notes that I spoke to the Council in 2005; what may be less well remembered is my work within the "East Lake Sammamish" watershed area throughout the mid- to late 1980's as the geologist for King County and likely the person most responsible for developing the "Best Available Science" that has supported the protections currently in place. The recommendations made in the East Lake Sammamish Basin Plan, and subsequently adopted first by King County and then by the City of Sammamish, were not developed arbitrarily nor without abundant rationale. Indeed, your city is host to some of the most geologically "sensitive" slopes across our entire region, perched above one of its most treasured resources. If exceptional levels of protection are not appropriate here, why should we bother at all?

With the limited time available to me before your deliberations come to a close, I have primarily reviewed the key section (4.7) of the Draft "Cumulative Impacts Assessment" document by ESA-Adolfson, dated May 2013, for which you provided me with a link. I also reviewed the AMEC report dated April 30, 2013, and read through what appear to be the critical sections of Chapter 21A.50 with the proposed changes.

I applaud the measures that the City has taken since incorporation to protect these critical areas, and the lake below them. From my 10 years in local government I understand that such work is never done, because short-term self-interest is a force that never disappears, and because protection must be maintained forever to be successful but development only needs to happen once. Now is not the time to rehash the scientific basis for exceptional protection here, nor to

remind the Council of the many examples of good intentions for mitigation that have been washed away in an "unexpected" winter rainstorm. I will simply call your attention to those passages in the ESA-Adolfson report that make the case as clearly as I could:

"Stormwater infiltration in areas of steep, erodible soils is typically very challenging. The areas in question include the Panhandle and Monohon drainages – areas which were identified in the East Lake Sammamish Basin and Nonpoint Action Plan as having 'the steepest slopes in the basin and erosive soils, and have extensive urban development in their headwaters' (King County 1994). This condition applies throughout much of the EHNSWB Overlay 'no disturbance' zones...Even with the criteria and limits in the proposed ECA amendment, this type of development in the EHNSWB Overlay could lead to water quality degradation in Lake Sammamish and the reaches of tributary streams within shoreline jurisdiction... the scale of development (applicable to existing residential lots greater than a half acre in size) and subdivision (allowed through the pilot program) suggests that some 'unharvested' runoff from developed surfaces is likely...In addition, allowances for site clearing would also likely result in increased runoff – even from pervious surfaces." (p. 29)

It is difficult for me to understand why the City would seek to put its namesake resource at such risk. There is no scientific basis to argue that we now know how to maintain all runoff, sediment, and nutrients on-site under such challenging topographic and geologic conditions. Any true application of the principles of LID would lead to the unbiased evaluation that these slopes are a portion of "the watershed" that need to be left fully undisturbed; subdividing them into parcel-sized pieces, each of which is severely constrained (but nonetheless required) to identify an "appropriate" site for stormwater management, bears no relationship to either the goals of "Low Impact Development" nor its application given our scientific and engineering understanding.

I wish you success in your deliberations.

Sincerely,

Derek Booth, PhD, PE, PG

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Derek B. Booth  
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University of Washington, Box 351310, Seattle, WA 98195  
Phone: (206)914-5031  
[http://faculty.washington.edu/dbooth/Booth\\_CV.pdf](http://faculty.washington.edu/dbooth/Booth_CV.pdf)

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> From: Evan Maxim [mailto:emaxim@sammamish.us]  
> Sent: Friday, May 17, 2013 2:27 PM  
> To: Derek Booth  
> Cc: Susan Cezar; etiliacos@att.net; fopl@juno.com; Ben Yazici; Kamuron  
> Gurol; Melonie Anderson  
> Subject: RE: Info Request RE: Erosion Hazard Overlay Sammamish  
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> Dr. Booth,  
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> Ms. Stahl has asked that the city provide you with information from our Environmental Critical Area (ECA) update process – please see the email below.

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> · Cumulative Impact Analysis Addendum (ESA, Inc) -

> <http://www.ci.sammamish.wa.us/files/document/11009.pdf>

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> · AMEC Environment & Infrastructure report -

> <http://www.ci.sammamish.wa.us/files/document/10975.pdf>

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> · The current Erosion Hazard Near Sensitive Water Body overlay

> is attached to this email (document titled “Current code - EHNSWB”)

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> · The proposed amendments are attached in the “Council Review DRAFT regulations” and are reflected on pages 23-33.

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> Regards,

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> Evan Maxim

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> Senior Planner

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> City of Sammamish

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> 425.295.0523

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> sent to my old email address are being forwarded temporarily, however please update your email address for me accordingly.

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> From: [fopl@juno.com](mailto:fopl@juno.com) [mailto:[fopl@juno.com](mailto:fopl@juno.com)]

> Sent: Friday, May 17, 2013 2:04 PM

> To: Ben Yazici; Kamuron Gurol; Melonie Anderson

> Cc: Susan Cezar; Evan Maxim; [fopl@juno.com](mailto:fopl@juno.com); [etiliacos@att.net](mailto:etiliacos@att.net)

> Subject: Info Request RE: Erosion Hazard Overlay Sammamish

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