

GFK Consulting

Land Development Services

May 20, 2013

RE: Sammamish ECA review

Honorable Mayor and City Council,

I would like to comment on several items that have been entered into the ECA Review record since the last public hearing on May 7th. First, like the DOE's April 23rd letter, the Cumulative Impacts analysis performed by ESA, as it pertains to the Erosion Hazard near Sensitive Water Bodies (EHNSWB) overlay, represents a measured, fair and favorable assessment of the Pilot Program included in the draft CAO language. In this report, ESA notes that

- "There is minimal potential for erosion and water quality impacts from new residential development and pilot project subdivisions that would tightline discharges to Lake Sammamish."
- "Similarly, the second development category under the pilot program (allowing subdivisions or short subdivisions on project sites less than 5 acres where runoff would be routed via connection to an existing off-site, manmade conveyance) appears to have limited potential to cause erosion and water quality impairment to downstream resources."
- "As long as runoff from new pollution generating impervious surfaces is treated as required, potential development using a tightline approach, including the three potential pilot projects, is not expected to have a significant impact on Lake Sammamish water quality."

The only negative aspect of the Pilot Program noted by ESA was the erosion issues posed by development designs that rely solely on infiltration of stormwater.

I would also like to comment on some recent letters submitted into the record that suggest the scale of the pilot program be drastically reduced to include only one, specially selected, five acre project. This recommendation would effectively render the Pilot Program untenable:

- An arbitrary selection process would discourage the financial investment necessary to submit the professionally prepared studies / application necessary to even make an informed decision.



- Tight-lined projects, which have been characterized by the DOE and the City's consultants as the most reliable to prevent erosion are also very expensive to construct. A small limit on project size would likely render them financially unfeasible.
- Limiting the Pilot Program to a single project does not allow for the collection of enough data to make a meaningful decision about the long term viability of the development practices proposed.

Finally, since the basins for Ebright Creek, Pine Lake Creek, "mid-Monohon", and Zaccuse Creek sub-basins are particularly sensitive to erosion, the suggestion that they be eliminated from the Pilot Program makes sense; inclusion of these basins could be considered at a later date if the Pilot Program is successful.

In conclusion, we believe that points made in the April 23rd DOE letter, ESA's Cumulative Impacts report, and by Council in regards to the Ebright, Pine and Zaccuse Creeks are valid and should be considered in the Pilot Program. To that end, we suggest revising the program and code to:

- Consider the need of designated open space to maintain groundwater recharge to adequately sustain wetlands and streams, but on a case by case basis (DOE / Krabbe).
- Prohibit pilot program projects within the Ebright Creek, Pine Lake Creek, "mid-Monohon", and Zaccuse Creek sub-basins (Valderrama-Aramayo, Vance, Gerend).
- Limit development and subdivision allowed within the no-disturbance area to those projects that can discharge directly to Lake Sammamish via tight-lined or existing man made conveyances (ESA), but maintain a minimum of six projects total to ensure a meaningful sample group.

Thank you for your continued work on the ECA review.

Sincerely,

Greg Krabbe
President