

2/26/2020

TO Lake Forest Park, WA  
Planning Department

FR Lake Forest Park Stewardship Foundation  
PO Box 82861, Kenmore WA 98028  
info@lfpsf.org

RE Public Comment regarding  
2019-RUE-0001, 2020-RUE-0001

We write to oppose the granting of these RUE applications as proposed.

As a public commentator the Stewardship Foundation should be added to the list of interested parties and receive all future notices and announcements regarding these applications.

Both applications propose gross invasions of a wetland buffer which, in its natural state, provides benefit to the salmon waters of McAleer Creek by protecting Hillside Creek which flows only 94 feet from the eastern edge of the subject properties.

Trees on these properties are not in great condition, but the development proposal degrades them further by "protecting" a few of the in ridiculously small, isolated "tree protection areas". These tree protection areas appear too small to be protective of the Critical Root Zones of the trees within the areas. In addition the development proposal proposes no protection for the Critical Root Zones of the healthy line of cedars near the northern edge of the property which are mentioned in the Tree Report for these projects, photo from Tree Report.



A significant natural asset will be lost to this proposed development. The largest landmark tree on the properties is a Western Red Cedar, DBH = 40.8" (Tree inventory #730). No mitigation plan nor young seedling will soon replace this environmental asset.

This application should be rejected until it includes clear delineations of the critical root zones of all trees not proposed for removal including the nearby neighboring cedars, and until protection of those root zones is assured during the clearing and construction process.

The analysis in these McDonnell reports is fundamentally flawed by the two lots being considered independently, rather than cumulatively. Cumulative impacts will be the reality of the proposed actions, cumulative impacts should be the basis for the analysis.

Surface water drainage from the proposed development's impervious surfaces is not proposed to be controlled in any effective way. The McDonnell Engineering Technical Information Reports (for lots BNUM LOTA and BYNUM LOTB) conclude that infiltration, retention, and permeable pavement are not possible on these properties because of the soil conditions. The reports provide a rough design of moving surface water away from the impervious services in troughs and letting it flow on top of the ground, referred to as "sheet flow".

Especially in the rainy months this additional push of water will magnify the irregular or spiky flows of Hillside Creek. Because the course of Hillside Creek is very steep below these properties, spiky flows bring large quantities of fine silt downstream. From a fisheries point of view, silt is a pollutant. Pollution of Hillside Creek and McAleer Creek, which receives the outflow from Hillside Creek, should be reduced not increased.

This application should be rejected until an effective method of surface water release is part of the development plan. Mound drainage systems, often used for septic systems created on inappropriate soils, offers a method of managing surface water release from these proposed developments.

Finally, the history of analysis of this property and its hydrology includes applications by Matson in 2012, supported by a Sensitive Area Report by Skagit Wetlands and Critical Areas, LLC. This report is dated 15 October 2012. It is an appendix A to the Critical Area Report that is part of the current applications. This report was weak in its analysis and subject to strong professional critique in a review by Cooke Scientific dated March 10, 2014.

This report recognizes the large divergence of professional opinion and delineation. The report wisely suggests that divergent professional opinions are best resolved by a third independent professional opinion. Good advice for today. too.

The Stewardship Foundation is hopeful that the City Planning Department will conduct a thorough review of the technical reports and provide a fresh review of these proposals that honors the environmental protective intent of the codes of Lake Forest Park.

## SOURCES CITED

- A. Found within the Planning Departments file regarding these RUE applications
  - a. Tree Inventory Report, May 13 2019  
Watershed Company Reference Number 180918
  - b. Technical Information Reports, BYNUM LOT "A" and BYNUM LOT "B"  
J C McDonnell Engineering, PC, JCM #05870A, JCM #  
March 13, 2019 revised, issue date September 12, 2017
  - c. Critical Area Report and Detailed Conceptual Mitigation Plan  
17100 and 1711- 28th Ave NE Property, Lake Forest Park WA  
Talasaea Consultants Inc, 15 February 2019
  
- B. Attached
  - a. Review of Critical Area reports, letter to Stewardship Foundation  
Cooke Scientific, March 10, 2014  
Commissioned by the Lake Forest Park Stewardship Foundation