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April 19, 2007

Ms. Cindy Baker
Interim Director of Development Services
City of Woodinville Development Services Department
17301 – 133rd Avenue NE
Woodinville, WA 98072

EXHIBIT 162
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Subject: Public Hearing Comments
Montevallo Rezone and Preliminary Plat

This letter provides some additional comments that I am requesting be entered into the Public Hearing record for the proposed Montevallo rezone and preliminary plat. development. These comments primarily concern the lack of analysis concerning wetland hydrologic impacts resulting from the discharge of stormwater runoff from the proposed Montevallo development. Some of these comments I have provided previously as oral comments during the March 15 Public Hearing. However, I am reiterating some of these concerns, as additional documents submitted by the applicant continue to disregard some of these unresolved issues.

The preliminary plat for the Montevallo development proposes to discharge all of the collected stormwater runoff into the onsite wetland via several dispersion trenches. There are numerous unresolved issues regarding the capability of the wetland to receive and convey the runoff discharge, and the resulting impacts on wetland hydrology, surrounding low-lying areas, and downstream receiving waters. These unresolved issues include the following:

- A revised "conceptual plan" for the proposed Montevallo development was presented by Phoenix at the Public Hearing. Although no information has been provided by Phoenix regarding changes in the amount of impervious surfaces as compared to the initial preliminary plat, the revised "conceptual plan" visually appears to result in an increase in the total amount of impervious surfaces. An increase in the amount of total impervious surfaces would result in a commensurate increase in stormwater runoff discharging to the wetland. The magnitude of this change in resulting stormwater runoff is not known, yet should be determined before a preliminary plat is approved.
- Regardless of the actual volume of estimated stormwater runoff and the ability of the detention facility to regulate discharge flows, there will be a net increase in the amount of water discharging to the wetland.
- There is no available information about the capacity of the wetland with respect to stormwater discharge flow rates and volumes.

- There is no available information regarding the elevation or flow capacity of the outlet for the wetland.
- There has been no analyses of potential impacts on existing wetland hydrology that would result from the discharge of significantly larger volumes of water into the wetland than currently occurs. The depth, duration and frequency of wetland inundation will be changed significantly as compared to existing conditions. An analysis of the wetland hydroperiod that will need to be maintained by the proposed stormwater conveyance system has not been completed.
- Specific flood attenuation functions provided by the wetland have not been addressed with respect to evaluating potential adverse impacts on the wetland ecosystem from the proposed discharge of stormwater runoff.
- Existing conditions as described in the FEIS indicate a somewhat delicate hydrologic balance with respect to the amount and timing of wetland recharge. Discharging too much stormwater runoff into the wetland might result in too much wetland inundation and additional flooding of neighboring low-lying properties. Not discharging enough collected stormwater runoff would result in a decrease in wetland recharge, resulting in an adverse impact to wetland vegetation and habitat.
- Surface water discharging from the Montevallo wetland eventually flows into the stream that is located immediately adjacent to the northern part of the Wood Trails site. This stream is the riparian corridor proposed for enhancement as part of the Wood Trails wetland mitigation. There will be increased surface water flow rates and volumes within this riparian corridor as a result of developing the Montevallo site. There has been no information provided by Phoenix regarding the magnitude of these changes, or the resulting impacts on the proposed riparian enhancement.

All of these wetland hydrology issues should have been addressed by the applicant, Phoenix Development, prior to requesting approval of the preliminary plat. The current version of the Montevallo preliminary plat should not be approved until Phoenix Development provides the specific information and analysis needed to evaluate potential impacts on wetland hydrology from the proposed discharge of stormwater runoff.

I would also like to comment on two unsupported statements recently submitted by the applicant's project team.

1. Wood Trails Exhibit No. 133, Letter from Sewall Wetland Consulting, Inc., dated April 5, 2007. Regarding wetland mitigation on the Montevallo site, on page 5 the document states "The plat and stormwater system has been designed to mimic existing hydrologic inputs to the wetland on the site and should not change the hydrology of the wetland". There is no direct data or analysis available for public review which supports this statement. The existing hydrologic recharge of the onsite wetland has not been evaluated, and it is not possible to compare existing

wetland hydrology with the developed condition given the numerous unresolved issues noted above.

2. Wood Trails Exhibit No. 134, Memorandum from Triad Associates, dated April 4, 2007. This memo restates the following unsupported statement regarding ground water recharge: "Changes to groundwater conditions would be minimal". Concluding that there would be minimal impacts to ground water conditions is not defensible because:

    - There is no specific information concerning existing ground water conditions beneath either the Montevallo or Wood Trails site.
    - Both of the sites will result in an increase in impervious surfaces.
    - There has not been any mitigation measures proposed by the applicant for maintaining existing ground water recharge conditions.
    - There would obviously be adverse impacts to ground water conditions as a result of the net loss of ground water recharge.
    - The lack of existing ground water data and analysis of potential impacts does not allow the magnitude of these adverse impacts to be evaluated with any degree of certainty.

Please include this letter in the Montevallo and Wood Trails Public Hearing Record, and forward it to the Hearing Examiner.

Sincerely,

Otto K. Paris, L.G., L.HG.
Hydrogeologist

14906 NE 198th Street
Woodinville, WA 98072