Otak

From: Jenny Ngo <jenny.ngo@otak.com>
Sent: Tuesday, August 19, 2014 2:00 PM
To: Otak
Subject: FW: Church Subdivision, PPA14001/SEP14017, Notice of Application
Attachments: copper toxicity_visibility vulnerability juv coho salmon predation by cutthroat trout_McIntyre et al 2012.pdf; Copper_effects_on_Salmonids_-_Abstracts_C A _Woody1.pdf; Landscape Ecotoxicology of Coho Salmon Spawner Mortality in Urban watersheds.pdf

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From: Karen Walter [mailto:KWalter@muckleshoot.nsn.us]
Sent: Tuesday, August 12, 2014 12:32 PM
To: Jenny Ngo
Cc: Dave Kuhl
Subject: Church Subdivision, PPA14001/SEP14017, Notice of Application

Jenny,
We have reviewed the Notice of Application for the proposed Church Subdivision located off of NE 205th Street in the Little Bear Creek watershed and offer the following comments:

1. Stream classification and mapping concerns
   Per the Critical Areas Study, there is an onsite stream which flows to the north from the site, under NE 205th Street then east to Little Bear Creek (see Technical Information Report ,TIR, on page 3-5). It is not apparent that this stream is mapped on the City's Critical Areas Map, yet this stream is described as one on the map for classification purposes. The City's map shows a Little Bear Creek tributary which generally flows southwest and is mapped as a Class 3 stream that may or may not be the same stream. Rather, the onsite stream for this project does not appear to be mapped on the City's Critical Areas Map or is mapped incorrectly. The City should research this further and let us know the results. For the onsite stream, it is described as "likely be considered a Type 3 stream" without providing the basis for this determination (Critical Areas Assessment, CAA, page 10). However, the data provided in this same report indicates the stream meets at least one of the criteria to be a potential fish-bearing water under WAC 222-16-031 at the bankfull width is identified as 3-5 feet wide which exceeds the 2 foot minimum bankfull width. It is likely that the stream gradient is also less than 16% and given Little Bear Creek's proximity to this stream, we suspect that it could support salmonids. The TIR does note that the existing culvert on NE 205th Street has a split in the pipe and is leaking water (page 3-6). The condition and size of this culvert may causing a fish-passage barrier and as such, it should be replaced as part of the project since the NE 205th street will be improved as part of the project (see TIR 4-1).

   In summary, the project needs to correctly classify the onsite stream(s) and verify that the City's Sensitive Areas map is correct regarding the location for all streams in the project vicinity. If there is a second stream flowing southeast to Little Bear Creek as shown on the City's map, then the project needs to consider potential impacts to the stream, too, depending on its proximity to the site.

2. Stream buffer concerns
   There is insufficient documentation and discussion regarding the proposed buffer reduction (from 75' regulated to 50' assuming correct stream classification) for this project. There are existing trees shown in the Critical Areas Study (Figure 2) on or just west of the 75' regulated stream buffer which should be protected as part of the project. Further, there is no analysis regarding functional impacts as a result of the buffer reduction including the permanent loss of the opportunity to restore the buffer for both shade and future wood recruitment to the onsite stream, particularly if determined that this is potential fish-bearing water. More information and analysis is needed before the stream buffer reduction is approved.

3. Stormwater treatment concerns

The project proposes to use basic treatment methods to treat stormwater. Instead, we recommend that the project be required to use enhanced treatment methods to treat stormwater as the stormwater will be discharged, eventually, to Little Bear Creek. As Little Bear Creek is a salmon-bearing water, stormwater discharges should be assessed for potential impacts to salmon in this stream. Salmon can be adversely affected by stormwater pollutants, particularly, metals and oils found in stormwater (see attached); therefore, we recommend that the project maximize its pollutant reduction methods by using enhanced treatment methods.

We appreciate the opportunity to comment on this proposal and look forward to the City's responses. We may have additional comments after new information is provided regarding stream classification and potential project impacts as discussed above.

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Thank you,
Karen Walter
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division
Habitat Program
39015 172nd Ave SE
Auburn, WA 98092
253-876-3116

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Agnes Kowacz

From: Jenny Ngo
Sent: Thursday, December 11, 2014 3:18 PM
To: Agnes Kowacz
Subject: FW: Church Subdivision - Follow Up

Please include this in the second revision letter to the applicant.

From: Karen Walter [mailto:KWalter@muckleshoot.nsn.us]
Sent: Tuesday, December 09, 2014 5:18 PM
To: Jenny Ngo
Subject: RE: Church Subdivision - Follow Up

Jenny,
Thank you for the follow-up email and information for the Church Subdivision project. We have reviewed the applicant's responses to our comments and find that all of our comments are outstanding. The consultants did not provide any data or information to verify the stream typing compared to WAC 222-16-031 regarding presumed fish use. This is an important point as they responses clearly note two TOTAL blocking culverts downstream which could account for the lack of fish presence data. This is exactly why WAC 222-16-031 is written the way it is and describes a simple method to determine potential fish use. Correct water typing is necessary for this and future projects that may occur on or near this stream.

Project impacts are also not sufficiently addressed as there is no functional assessment regarding riparian buffer functions, including potential temporal loss of function due to tree removal.

I appreciate the opportunity to converse with you regarding these concerns. Please let me know if you have any questions.

Best regards,
Karen Walter
Watersheds and Land Use Team Leader

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From: Jenny Ngo [mailto:JennyN@ci.woodinville.wa.us]
Sent: Friday, November 21, 2014 2:56 PM
To: Karen Walter
Subject: Church Subdivision - Follow Up

Hi Karen,

You sent comments several months ago regarding the Church subdivision (the project is now known as Parkwood Terrace) in Woodinville. We received revisions very recently that I am sending on to you for your review and feedback. Attached includes a revised SEPA checklist, critical area assessment, response letter, and a city-generated GIS map.

I looked into your question related to the unmapped stream along the western portion of the property. You are correct that this stream is not located on our critical areas map. It appears that the tributary either ends at the southern end of this property or was not mapped beyond this point. I believe that the latter is more likely the case based on our GIS mapping data (pdf attached) showing the approximate location of the stream in relation to the property. The tributary is listed as "Unnamed Tributary E" in the Little Bear Creek Habitat Assessment prepared in 2002 (see page 17 of this document). I do

not believe that there has been an accurate typing of this stream, as our data shows either this stream is untyped or a Type 4 stream, depending on the GIS dataset.

The City is currently working on updating the critical areas ordinance as part of our comprehensive plan. I am hoping that the results of this assessment (once completed with correct documentation) will assist us to update our maps with this stream. Please let me know if you have any thoughts on this. We are still working through our review and your comments would be great appreciated.

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Thanks,
Jenny

Jenny Ngo, AICP
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