

Amanda Almgren

From: Karen Walter <KWalter@muckleshoot.nsn.us>
Sent: Wednesday, March 16, 2016 4:44 PM
To: Amanda Almgren
Cc: Jenny Ngo
Subject: RE: SEPA Notice of Application
Attachments: BDA warehouse, SCU13001/SEP13002/DRA13001/SDL13002, Determination of Non-Significance, MITFD Habitat Program follow up comments

Amanda,

We have reviewed the Notice of Application materials for the proposed "Reserve at Woodinville" warehouse project referenced above. Thank you again for assisting us with access to the project materials requested.

Background

We provided comments for this site while it was proposed as the BD Warehouse Project (SDP-13001/SEP130002/DRA13001/SDL13002) prior to its approval dated February 3, 2014. Our previous comments to the BDA Warehouse project were sent via an email dated January 10, 2014 to Jenny Ngo and Erin Martindale. We did not receive responses and from our review of the application materials for the Reserve at Woodinville warehouse, many of these comments are relevant. Therefore, we offer the outstanding concerns from our follow-up previous comments and the full set of our previous comments via the attached email.

Riparian plantings and stormwater facility

The amount of trees to be planted along the stormwater facility need to be maximized to provide shading to the stormwater treatment wetland so that in the event of warmer weather stormwater discharges, the resulting warm stormwater is not adding to the existing temperature problems in the Sammamish River.

Reduced Riparian Mitigation Area

It is important to note that the existing sewer line in the regulated riparian buffer for the Sammamish River limits planting of trees that would otherwise provide shade to the Sammamish River and become a source of wood (both functions are degraded currently). Previously this areas was estimated to be approximately 13,000 square feet, which must be reduced from the stream buffer mitigation area because it will not provide a full suite of riparian functions. From drawings W2.0 and W2.1, it appears that the sewer line has been included equally to other areas shown as buffer enhancement and re-established buffer. If this is the case, it should be removed from the square footage calculations because of the sewer line limitations on restoring trees.

As far as access to the Sammamish River buffer mitigation area is concerned, the access should be kept to a minimum as the proposed trails also eliminate the opportunity to restore the stream buffer fully with trees along the project site that are needed for shade and future wood recruitment functions. Further, trails along the river provide opportunities for poaching and overall disturbance to returning adult salmon. As a result of these concerns, we recommend that the river/buffer access be limited to one trail and viewpoint. The south-end trail/viewpoint shown on Sheet W1.1 seems to be the most logical one to retain as it follows the parking areas and will be along the stormwater wetland facility, too.

The proposed warehouse viewpoints shown on Sheet W1.1 will further limit the ability to plant trees. This is reflecting in Sheet W2.0 which shows rather large areas of 40 feet or more along the Sammamish River where taller tree species (i.e. Douglas fir and Western Red Cedar) will not be planted. The project needs to reduce these impacts to the necessary restoration of the Sammamish River's riparian area to meet State Water Quality standards and restore water temperatures and dissolved oxygen for salmon in the river.

The applicant has not demonstrated that a reduced 100-foot buffer will achieve the same functions as a 115-foot buffer, particularly for two key functions: shade and future wood recruitment, particularly given the other tree planting constraints identified above. There is no analysis discussing how degraded the existing conditions are; the expected results (including an effective shade analysis) from the reduced buffer and the need to maximize the buffer to provide effective shade and future wood recruitment. For example, the area necessary for these functions could potentially include the entire 200 regulated shoreline area as this area may represent the tree height potential for the tallest tree that can grow on the adjacent soil types that could otherwise recruit to the Sammamish River. Franklin and Dyrness (1973);

<http://www.treearch.fs.fed.us/pubs/26203>) found that the dominant tree species in Western Washington can typically reach heights of 50 to 75 meters (or 164 -246 feet).

The Sammamish River is listed for exceeding State water quality standards for temperature (see <https://fortress.wa.gov/ecy/wqamapviewer/default.aspx?res=1280x720&Istid=7028&CATEGORY=5>) and dissolved oxygen. The Sammamish River along the property is included in one the listed segments. Water temperatures have been high enough in the Sammamish River to create lethal conditions for returning adult Chinook and sockeye salmon. Temperature conditions can also have sublethal effects such as affecting upstream migration and reducing egg fecundity that affects successful juvenile production. Therefore, it is necessary to maximize trees that will provide shade in order to reduce water temperatures, particularly along the Clean Water Act Section 303(d) listed segments of the Sammamish River.

The Washington State Department of Ecology has investigated shading and riparian conditions as part of their Total Maximum Daily Load planning process for Bear Creek, a waterbody that exceeds State water quality standards for temperature. For Bear Creek, Ecology created an effective shade model with stream buffers of 150 feet because “of limitations in simulating the loss of other riparian functions (e.g., microclimate improvements, erosion control, and channel stability)”. They also looked at a maximum of 328 feet (100 meters) to determine the maximum shade potential (WDOE, 2008 Publication 08-10-058). These were the values used for Bear Creek, which is a smaller sized waterbody than the Sammamish River. A shade model and analysis to determine effective shade necessary to improve water temperatures and meet State Water Quality standard would likely be at least 150-328 feet based on the Bear Creek model. As you can see, these distances are significantly larger than the proposed 100 foot reduced buffer along the Sammamish River. A more detailed analysis could be done to determine the extent of effective shade needed for the Sammamish River that includes aspect, refined temperature analysis, etc. but at this time we have no reason to believe that the buffer widths would be less than those determined necessary for Bear Creek and represents a “best available science approach”.

As part of these concerns, we noted the 2010 R2 report on the Sammamish River completed for the Tribe and sent the City a CD of this report. This is an important study that does a good job summarizing all of the known water quality data, the temperature problems in the Sammamish River, locations of adult Chinook found from tagging studies, etc.

While the proposed 100-foot reduced enhanced buffer is certainly an improvement over existing conditions, it is insufficient to provide for the trees needed to provide shade and future wood recruitment. If there are no further design change opportunities to increase and plant more trees in the riparian buffer on site, then the City should require additional mitigation for the reduced stream buffer and permanent loss of stream functions to be applied elsewhere along the Sammamish River with tree plantings that will increase shade and future wood recruitment. The amount of mitigation should be based on the amount of reduced stream buffer function needed which could be an additional 100 feet width for the length of the project site based on the discussion above regarding effective shade and stream buffer widths.

For what is mitigated on site, the mitigation area should be placed into a conservation easement to ensure its protection over time. The performance monitoring period should be extended beyond 5 years based on the existing of reed canarygrass and Himalayan blackberry on site and adjacent areas that can significantly affect the riparian planting success. We request copies of the “as-built drawings” and the monitoring reports for the mitigation areas when they are sent to Woodinville.

We appreciate the opportunity to comment and look forward to the City’s responses. Please let me know if you have any questions.

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*

From: Amanda Almgren [mailto:AmandaA@ci.woodinville.wa.us]
Sent: Monday, February 15, 2016 10:01 AM
To: Amanda Almgren

Cc: Jenny Ngo

Subject: SEPA Notice of Application

Please see the attached Notice of Application for SEPA review of a project to construct two new warehouse buildings with a combined footprint of 199,700 square feet and 194-stall parking lot in the Industrial Zone along the Sammamish River.

In addition to the attached materials, the follow materials are available for review at your request: Critical Areas Special Study, Floodplain Habitat Assessment Report, Cultural Resources Investigation, Arborist Report, Geotechnical Report, drainage study and traffic and parking report.

The Comment Period starts February 15, 2016 and ends March 16, 2016. Please submit comments and concerns by email to amandaa@ci.woodinville.wa.us.

Project Name: The Reserve at Woodinville

File Nos. LUA16001 (Land Use Approval), SEP16002 (SEPA), DRA16002 (Design Review), CAA16001 (Critical Areas Alteration), SCU16002 (Shoreline Conditional Use), SDP16001 (Shoreline Substantial Development)

Applicant: Panattoni Development Company, Inc.

Project Location: 15902 Woodinville-Redmond Road

Project Description: Land use approval to construct two warehouse buildings with a combined footprint of 199,700 square feet and 194-stall parking lot in the Industrial Zone. Construction includes grading and drainage improvements, street improvements, tree removal, landscaping installation, and shoreline enhancement and restoration. The site is within the shoreline jurisdiction and is subject to review under the Shoreline Master Program. SEPA review is required for buildings exceeding 4,000 square feet and construction of more than 20 parking stalls.

Staff Contact: Amanda Almgren, Associate Planner at (425) 877-2283 or amandaa@ci.woodinville.wa.us.

Thank you!

Amanda Almgren
Associate Planner

amandaa@ci.woodinville.wa.us

425-877-2285