

Concerned Neighbors of Wellington

"Dedicated to Preserving the Character of the Wellington Neighborhood"

November 1, 2004

Mr. Ray Sturtz, Planning Director
Mr. Dick Fredlund, Planner
City of Woodinville
17301 - 133rd Ave NE
Woodinville, WA 98072

Subject: Comments on the EIS Scope for Wood Trails, Montevallo and 11.8-Acre Future Development Sites

These comments concern the scope of the EIS for the proposed Wood Trails development and associated parcels proposed for residential development. The comments are submitted on behalf of the Concerned Neighbors of Wellington (CNW). CNW consists of a group of over 150 Woodinville residents and property owners living in the northeast area of the City commonly known as the Wellington neighborhood.

As described in the City of Woodinville's Determination of Significance (DS) Notice, the City has requested that the applicant, Phoenix Development, prepare an EIS for the purpose of evaluating potential environmental impacts associated with the development of three separate parcels/sites:

- The 66-lot plat identified as the Wood Trails residential development (Wood Trails).
- An 11.8-acre parcel located north and adjacent to the Wood Trails development site.
- A 16.5-acre site located adjacent to 156th Avenue NE that has been identified as the Montevallo residential development (Montevallo). Based on the limited information provided by Phoenix Development to-date, the Montevallo development will consist of 67 to 70 individual residential lots.

According to the DS Notice, the applicant has proposed that all three of the sites be rezoned from the existing R-1 residential zoning designation to an R-4 designation.

At the public scoping meeting on October 28, 2004, the City informed the audience that the 11.8-acre parcel located north of the Wood Trails development has been removed entirely as part of the Proposed Action for this EIS. Based on the City's comments at the scoping meeting, we understand that this parcel is no longer included in the rezoning request, nor can be used to transfer any density credits to the Wood Trails or Montevallo developments. The City stated that (1) any future land-use actions associated with development or rezoning of the 11.8-acre parcel would initiate a separate application and SEPA review process, and (2) at this point in time, the parcel has no direct bearing on the

P.O. Box 2934, Woodinville, WA 98072-2934
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Wood Trails and Montevallo SEPA review process and EIS. The City also mentioned that Phoenix Development has, or intends to, submit a request for a Boundary Line Adjustment (BLA) for the 11.8-acre parcel. Specific details regarding the BLA have not been provided to CNW. However, the BLA will create one or more additional parcels that could be used for either future residential development at the site, or to transfer the density credits from the new parcels to another proposed development site. The BLA for the 11.8-acre parcel is part of the overall Proposed Action as stated in the DS Notice, and should be evaluated in conjunction with development at the Wood Trails and Montevallo sites.

As noted in the City's DS Notice, the proposed developments would more than double the numbers of residential units in the Wellington neighborhood. CNW has been evaluating the adverse impacts the proposed developments would have on the following:

1. The existing characteristics of the affected neighborhood;
2. The existing environmental conditions at the proposed development sites and surrounding areas;
3. Future development of other parcels in the Wellington and Leota neighborhoods currently zoned as R-1;
4. The existing supporting infrastructure, many elements of which are already deficient, and with no known funding mechanisms for required mitigation.

The high density, urban character and remote location of the Wood Trails site causes significant adverse impacts due to its unsuitable site conditions, unacceptable access options, and incompatibility with existing and future land use in the neighborhood. Likewise, the high density and urban character of the Montevallo site also causes significant adverse impacts to existing and future land use in the Wellington area.

The applicant's overall goal is to develop the "buildable" portions of the sites to actual physical densities ranging from R-6 to R-8+. This would be accomplished by using a combination of clustering and the possible transfer of density credits between various parcels owned by the applicant, resulting in significant long-term implications to future residential development throughout the Wellington and Leota neighborhood areas. Proposed development of the Wood Trails and Montevallo sites would likely initiate a trend to develop or redevelop other parcels in the Wellington and Leota neighborhoods at greater densities than currently exist, or planned for in the Woodinville Comprehensive Plan. This is in direct contrast to many of the area-wide planning considerations that are already in place or being updated. By allowing development in this area at actual densities of R-4 and greater, the overloaded infrastructure currently supporting the Wellington/Leota area, such as arterial roads, would need significant improvements. However, funding for infrastructure improvements of this magnitude has not, to our knowledge, been identified or secured.

Given that the proposed developments would have a significant overall adverse impact on the existing neighborhood, it is our opinion that the EIS should:

1. Be completed by the City in a fair and objective manner.
2. Include a set of alternatives that considers a wide-range of options for residential development at the two sites.
3. Be comprehensive in scope, and include a thorough well-documented analysis of each potentially effected element.
4. Include a complete analysis of potential indirect impacts, cumulative impacts, and unavoidable adverse impacts for each of the elements and each of the alternatives.
5. Evaluate the long-term impacts to future development in the Wellington and Leota neighborhoods.
6. Be completed in a manner such that all analyses and conclusions are fully documented, verifiable, and meet or exceed the standards commonly employed to evaluate comparable sites that involve long-term planning issues of similar breadth and magnitude.

The following sections of this letter summarize our specific comments concerning the scope of the EIS. For organizational purposes, we have grouped our comments for the scope of the EIS into three general topics: (1) general EIS/SEPA issues and concerns, (2) specific elements of the EIS, and (3) specific issues associated with the identification and development of alternatives for the EIS analysis.

General EIS/SEPA Issues and Concerns

1. We understand that the City is planning to have the applicant's design engineer prepare the EIS. This approach invites a large degree of unwarranted partiality to the EIS process. We understand that the City has retained a qualified consulting firm to review the EIS. However, to maintain a high level of objectivity and appearance of fairness to avoid any real and/or perceived conflict of interest, either City staff or a "neutral" third party consulting firm working on the City's behalf should be responsible for scoping and preparing the EIS. The EIS should not be prepared by any consulting firms that are, or have been, under contract with the developer.
2. CNW recommends that in scoping and preparing the EIS, the City should coordinate with other agencies, municipalities and public entities that might be effected directly or indirectly from the proposed developments. As many of us have become aware in recent months, there are multiple comprehensive long-term planning activities and regulatory review processes currently underway or in-place. These activities could have significant impacts on the Wellington neighborhood and surrounding areas, or in turn would be effected by the proposed developments and rezoning request. Examples include: Woodinville Water District's preparation of a new Comprehensive Sewer Plan; Snohomish County's

update of their Comprehensive Plan (which includes development of the Wellington Hills Golf Course property); the Northshore School District's Capital Facilities Plan; the City's review and approval of amendments to the City's environmentally sensitive areas regulations; and the City's Capital Improvement Plan (CIP).

3. The City should consider evaluating the applicant's rezone request and associated transfer of density credits separately and on its own merits relative to long-term impacts to the entire Wellington/Leota neighborhoods and supporting infrastructure. This rezone request presents a wide-range of long-term planning and design issues which extend beyond the specific aspects of the Wood Trails and Montevallo residential development sites. The EIS should include an analysis of the direct and indirect cumulative impacts that would result from the approvals of these projects. The projects create the precedent of allowing for R-4 (or greater) residential development in the entire Wellington/Leota residential neighborhood currently zoned as R-1. Changes that would be needed in the City's Comprehensive Plan and CIP should be identified, along with potential sources of funding that would be needed to provide the associated infrastructure required to accommodate the significant increase in the residential population.
4. We request that the City consider development of a Wellington/Leota neighborhood plan that evaluates all of the long-term planning activities currently underway for this area and the immediate vicinity. The neighborhood plan should include: (1) an assessment of current infrastructure deficiencies such as arterial roads; (2) an evaluation of additional long-term impacts posed by likely future development scenarios; and (3) identification of realistic mitigation measures and funding sources. This type of neighborhood plan would allow the City to evaluate the impacts posed by developments such as Wood Trails and Montevallo within the context of overall planning considerations. The neighborhood plan should be undertaken and completed before the City decides on whether or not to approve the Wood Trails and Montevallo residential developments and the associated rezoning request(s).
5. CNW is concerned about the possibility that the anticipated scope of the EIS will be limited to too few alternatives of limited scope. The applicant and the City have apparently decided to complete one EIS that covers: (1) both the rezone and associated transfer of density credits for the individual sites; (2) the specifics of the proposed Wood Trails development; and (3) the specifics of a second development site, the Montevallo site. The Montevallo site is not geographically contiguous with the Wood Trails site, but is apparently associated solely on the basis of having the same developer applicant. Given the available information for the proposed development sites and our understanding of SEPA requirements, developing a short list of reasonable alternatives will be a relatively arduous process. Limiting the list of alternatives makes it extremely difficult to fully evaluate the multiple combinations of rezone requests, transfer of density credits requests, and the various specific site development options and associated constraints for each of the sites. CNW strongly encourages the City to create a

range of reasonable alternatives that covers all of the design options, zoning options, environmental costs, potential degradation of neighborhood quality, and infrastructure impacts options associated with each project site both individually and collectively.

6. The City should consider economic issues when evaluating alternatives for the various zoning, density credit transfer, and site access scenarios. These issues would include: (1) the likely loss in value of existing residential homes located adjacent to the proposed developments and along the proposed access roads; (2) costs to provide and maintain access during site construction activities without degrading current road conditions, or creating or exacerbating safety issues, or impairing current use of the neighborhood streets by existing residents; and (3) long-term costs to upgrade the existing infrastructure. The City should consider the merits of purchasing the Wood Trails property to maintain the buffer between industrial and residential areas, and to minimize long-term costs to the City that would result from sharing the burden of mitigating or remediating infrastructure problems associated with site access, site stability, and site access issues.
7. We are concerned that during this EIS scoping comment period, there has been no specific description of possible land use for the 11.8-acre parcel, although the applicant's rezone request originally included this parcel as noted in the DS. As stated previously, the BLA for this parcel is part of the overall Proposed Action. For SEPA purposes and plat review purposes, it should be evaluated as part of the EIS analysis. A more-complete description of the project for this parcel and the Proposed Action that includes the BLA element is needed so we can provide specific comments concerning this issue. There does not appear to be a good reason for effectively creating a new parcel through the BLA, given the limited available information and the apparent motivation behind the BLA request to develop the Wood Trails and Montevallo sites. Because Phoenix Development originally included this parcel in the rezone request, it is likely that they will return to evaluating this site to either develop portions of the site, or to transfer the density credits to one or more nearby sites. This probability requires that the EIS analysis includes the 11.8-acre parcel as potential future R-4 residential development to evaluate direct, indirect and cumulative impacts.
8. CNW is concerned about the lack of currently available information for the Montevallo site that will be required to complete the EIS. Based on Triad Associates' brief presentation at the October 28 scoping meeting, we understand that Phoenix Development will submit an application for the Montevallo site in the very near future. The timing of the application submittal by Phoenix Development to immediately follow the end of the EIS scoping period does not provide the public with some "hard" information concerning the Montevallo site. Without the project application information, providing site-specific comments within the timeframe of the EIS scoping comment period is not feasible. We are basing our comments on (1) a preliminary site plan that the applicant provided the City sometime within the last two months, (2) the limited information that Phoenix Development and Triad Associates provided during an open-house type

meeting in August, and (3) the limited information that Triad Associates provided at the October 28 public scoping meeting. The knowledge that the application for Montevallo will be submitted in the near-future appears to warrant an extension of the EIS scoping comment period. We believe the EIS scoping activities should cease until the applicant has committed to specific project plans for the Montevallo site. This would provide the public an opportunity to submit informed comments about the entire Proposed Action for the EIS.

9. The City should prepare a formal scoping document that summarizes the scoping comments and describes the scope of the EIS that will be prepared. The scoping document should include: (1) the elements that the City has identified as needing a detailed analyses of potential impacts; (2) the rationale for excluding specific elements from the EIS analyses; (3) a description of the various alternatives that have been developed for the EIS; and (4) how the selected alternatives encompass the range of development scenarios for the two sites and provide for a complete analysis of long-term impacts to the Wellington/Leota neighborhood areas.

Elements of the EIS

The DS Notice identified three general areas/elements that the City has identified as needing further analyses in the EIS: impacts on neighborhood, traffic and stormwater drainage. CNW agrees that these three areas should remain key issues for development and preparation of the EIS. However, it is our opinion that (1) there are other specific issues associated with neighborhood impacts, traffic and stormwater that do not appear to be clearly identified by the City, and (2) there are additional elements of the environment that would be significantly impacted that were not identified in the DS Notice. The following list summarizes our comments concerning elements that should be addressed during development and preparation of the EIS.

The Wood Trails site has been known and considered to be one of the most challenging and difficult sites for development within the City of Woodinville due to its steep and unstable slopes, difficult access, critical areas, and acknowledged buffer between adjacent industrial and residential areas. Based on the limited available information, the proposed development for the Montevallo site does not appear to have the quantity and magnitude of site constraints and access issues as the Wood Trails site. For ease of discussion, the following discussion of the EIS elements pertain to both of the sites unless noted otherwise.

1. Earth - Subsurface Site Conditions: The geotechnical analysis submitted as part of the Wood Trails application package is completely inadequate to address many of the environmental and design issues associated with development of this property as planned. Gaining a thorough understanding of subsurface conditions beneath each of the sites is needed to complete the level of analyses appropriate for the EIS. For the Wood Trails site, a well-designed and documented exploration program is needed to: (1) obtain an understanding of the subsurface

soil and groundwater conditions at depth across the entire site; (2) evaluate geologic hazards (see below); and (3) evaluate site development constraints. At a minimum, explorations should extend to appropriate depths to provide for: (1) the assessment of soil characteristics below depths anticipated for excavation and grading cuts; (2) a thorough slope stability analysis; (3) identification and characterization of existing or potential seasonal perched water table conditions; and (4) measuring the depth and thickness of the water table aquifer.

2. Earth - Geologic Hazards: The Wood Trails site consists of steep and extremely steep slopes. Most of the Wood Trails site is located in a high erosion hazard area as depicted on critical area maps. A complete analysis of geologic hazards, particularly landslide hazards, erosion hazards, and seismic hazards, should be included in the EIS for both the existing and developed conditions. Results from the seismic and fault studies actively underway for the proposed Brightwater Treatment Plant studies should be incorporated into the analysis of seismic risk and associated slope stability analysis. Erosion hazards, sediment transport, and landslide hazards both on and off the site should be evaluated for site construction activities and likely post-development activities. Steep slopes and other geologic hazard areas need to be clearly defined and/or delineated to accurately determine their limits and assess the net buildable area and ultimately the actual density.
3. Earth - Construction-Related Impacts: A complete analysis of potential construction-related impacts associated with soil erosion, geologic hazards, and water quality should be completed. This is particularly critical for evaluating potential on-site and off-site impacts at the Wood Trails site given the current limited site access, the presence of numerous ravines and steep slopes, and the presence of developed industrial facilities located at the base of the slope. Methods for clearing, excavating, hauling, and protecting the estimated 110,000 cubic yards of earthwork at the Wood Trails site should be evaluated. There are numerous on-site and off-site impacts from earthwork of this magnitude. Estimates and locations of soil cuts and fills should be determined for the Proposed Action and the alternatives to fully address the construction-related impacts. The limited access and site topography will necessitate the setting up of various staging areas for allowing heavy equipment to clear, strip and grade the various "isolated" residential clusters spread across areas of the site that are bordered by ravines and steep unstable slopes. Setting up the needed staging and working areas will undoubtedly require that clearing and grading activities extend beyond the developed "footprints" shown on the site maps. The EIS should also include an evaluation of potential impacts to the existing stormwater conveyance systems in the industrial area resulting from the transport of large quantities of sediment-laden runoff generated during site construction and stabilization.
4. Groundwater Recharge: The existing undeveloped nature of the property sites provides a significant amount of groundwater recharge. A thorough analysis of groundwater recharge, including a water balance analysis comparing the existing and developed conditions, should be completed to evaluate hydrologic impacts. Changes in groundwater recharge would impact intermittent or perennial

discharge to on-site and off-site tributary drainages, discharge to on-site and off-site wetlands, and base flow for Little Bear Creek.

5. Stormwater Control, Conveyance, Treatment and Discharge: The EIS should include a complete analysis of (1) the existing and developed surface water conditions, and (2) the proposed stormwater runoff collection system. The significant increase in impervious surfaces at both of the sites will result in significant increases in stormwater runoff. Assuming that final grading at the Montevallo site would generally follow the existing topography, the resulting stormwater runoff would likely be routed to the western portion of the site and adjacent to an existing wetland. The EIS should evaluate impacts to wetland hydrology and downgradient properties caused by changes to runoff volumes and rates, and associated fluctuations in the water table. There are numerous technical issues and concerns associated with the proposed stormwater conveyance and discharge system currently proposed for the Wood Trails site. These include: construction and operation of the proposed very large detention pond located near the base of a very steep slope and immediately upgradient of existing industrial facilities; impacts to maximum flow capacities for the downstream industrial stormwater conveyance system from the detention pond outlet to the final discharge point adjacent to Little Bear Creek; use of temporary facilities for stormwater control and treatment during site construction activities; potential temporary and/or long-term impacts to slope stability, soil erosion, base groundwater flow, seeps, and surface water flows and sediment transport in the numerous ravines.
6. Environmental Health: The current undeveloped characteristics of the Wood Trails site provide a needed buffer between the industrial and residential areas for minimizing ambient noise emanating from industrial activities. Development of the Wood Trails property will significantly increase the ambient noise levels and detectable industrial odors. Overall ambient air quality could also be degraded by the removal of a large area of relatively mature forest. The EIS should identify and analyze impacts to existing noise levels and air quality in the adjacent neighborhoods. From the other perspective, the EIS should analyze the impacts to industrial operations in response to future complaints by the Wood Trails residents regarding noise, odor, and other potential environmental health issues if the buffer is removed. Noise impacts related to construction activities at the sites should also be included in the EIS analysis.
7. Wildlife Habitat: Numerous sitings of listed species, including endangered or threatened bird species, have been noted by nearby residents at the sites and in the immediate vicinity. The Wood Trails site provides an extensive area of undisturbed wildlife habitat, and provides a key wildlife corridor for migratory animals in Woodinville and neighboring south Snohomish County. The clear-cutting and development of the sites will destroy this wildlife habitat. A detailed investigation and analysis of threatened or endangered species and existing wildlife habitat should be completed by a qualified wildlife biologist for the purpose of completing the impact analyses.

8. Scenic Resources and Visual Aesthetics: The City recognized the importance of buffering the North Industrial Neighborhood and the adjoining residential area to the east with Resolution No. 093. The resolution clearly identified the “natural slope barrier between the industrial neighborhood and the adjoining residential area to the east”. The resolution further stated that a low-density residential designation shall be retained between the buffer and 148th Ave NE due to steep slope sensitive areas. The buffer was deemed important to separate/protect industrial uses and effects from residential neighborhoods. The intent of the resolution is clear, and any development of this site must be consistent with it.

The clustered effect of lots in Wood Trails and Montevallo sites would physically look like R-6 to R-8+ residential housing and would visually and aesthetically conflict with the existing neighborhood character. For example, the Wood Trails lots are arranged like “row-housing” along the eastern boundary, and the result is the abutting one-acre homes will have 3-4 neighbors each. There is no visual buffer proposed to maintain the level of visual privacy that exists throughout the Wellington neighborhood.

9. Existing Land Use Plans, Zoning, and Housing: The proposed developments would be isolated from other similar moderate-density developments located elsewhere in the City. However, the extension of sanitary sewer service eastward from this development will likely result in higher density redevelopment nearby, and the cumulative effects and impacts of this increased density need to be identified as a part of this project. The development as currently proposed is incompatible with both the existing neighborhood (zoned R-1) and the adjoining industrial area. Potential impacts to offsite areas, including the industrial properties located immediately downgradient of the site, have not been addressed.

Higher density housing such as that proposed for the two sites should be located close to main arterial/highway access, and not at the extreme end of dead end streets in low density residential areas.

Because of density credit transfers and clustering, the proposed developments would actually result in “as-built” densities classified as Moderate Residential Density in the City’s Comprehensive Plan and Municipal Code, consisting of R-6 to R-8 density patterns.

10. Existing Neighborhood Character: The City’s Comprehensive Plan provides a number of Policies and Goals to protect and preserve existing neighborhoods. The following are among the Policies and Goals that should be used to ensure consistency with the Comprehensive Plan.

- LU-1.1** Preserve the character of the existing neighborhoods while accommodating projected growth over the next 20 years
- LU-3.2** Preserve the existing natural environment of the neighborhoods
- LU-5.7** Protect geologically hazardous areas

H-1.1 Allow for a variety of housing types and lot sizes

T-2.1 Require new development to pay its fair share for transportation improvements

Impacts to the existing Wellington / Leota neighborhood need to be evaluated. The relatively high-density Wood Trails and Montevallo developments contrast sharply with the existing R-1 rural residential character and the urban character of the high-density proposal. Larger setbacks and separation of homes; larger yards with lawns, trees, and natural vegetation; paved streets with gravel shoulders and no sidewalks characterize the existing residential area. The proposal is characterized by minimum setbacks and separation of homes, small yards with minimal landscaping, paved streets with curb, gutter, sidewalk and on-street parking.

For example, the clustering of 66 lots on 10.4 acres in Wood Trails is high density and not compatible with the neighborhood character and residential density of 1 unit/acre. The proposed layout of the development using three semi-isolated “pods” does not result in a self-contained integrated community, does not integrate in a beneficial way to the existing adjoining residential areas, and would adversely impact the existing characteristics of the adjoining streets and neighborhoods. The proposed development does not, in any aspect, complement the existing development pattern of the adjacent and nearby residential neighborhoods.

11. Open Space and Recreational Areas Within Developments: There are no active open space or recreation/play areas identified within Wood Trails, and it is unknown if space is provided at the Montevallo site. Due to the small lot size, constrained site, and lack of nearby public facilities, adequate active open space should be provided for both of these developments. The adequacy of existing neighborhood active and passive recreational facilities should be studied as part of the EIS. The maintenance and security responsibilities associated with the Native Growth Protection Area (NGPA) and stormwater ponds should be thoroughly evaluated including risks of erosion, flooding, slides, or other failures that could result on this site.
12. Schools: The capacity for significant additional student enrollment at existing schools should be determined and coordinated with the school district. Pedestrian routes and connections from the development to Wellington and Leota Jr. High School are not referenced and are critical non-motorized elements to be evaluated. The EIS should identify existing walking routes to the schools, and complete an analysis of safety issues along those routes. The City’s 6-year CIP identifies two (unfunded) non-motorized projects for the Wellington area, and one is specifically intended provide a safe walking route to the schools.

13. Transportation – Traffic Operations and Safety: The Transportation Impact Analysis was performed for Wood Trails only and needs to be updated to include all development being proposed. Recently the Costco development was approved, and traffic volumes and impacts to 156th Ave NE need to be incorporated into the update. The Wood Trails analysis focused on traffic volumes and levels of service along 156th Ave NE and Woodinville-Duvall Road, and concluded that there was no significant degradation in level of service caused by Wood Trails. The trip distributions did not reflect the constrained (multiple dead-ends with only one outlet) street network in the Wellington area and the distribution of trips to the Golf Course Road were not consistent with actual travel patterns. This is incomplete, as there are a number of traffic related impacts that were not identified and need to be addressed. AM and PM peak hour analysis should be considered with consideration for AM school-related travel. The updated analysis should identify construction-related traffic, including operations and safety when school children are present, along with construction vehicle and equipment access to the parcels throughout the construction period.
14. Transportation – Traffic – Street Deficiencies: The Transportation Analysis fails to describe the numerous deficiencies that exist along these residential streets that were never intended to serve high density development as being proposed. They were intended to provide basic access to rural residential parcels, and in many locations do not meet City standards. Deficiencies include lane and shoulder widths, site distance, reduced/restricted speed limits, pavement condition, sidewalks/paths, crosswalks and lighting. The EIS should include a detailed analysis of the livability and usability of the proposed neighborhood access roads, both for construction-related and post-development use, that would have significant increases in traffic volumes. A more thorough analysis is required to determine where improvements are needed to address safety, operational and structural deficiencies.
15. Traffic - Cumulative impacts: Extending R-4 zoning over the adjacent area should be considered as well as the potential for short plats for larger parcels now occupied by a single home. The traffic impact of a broad area of rezoning on adjacent streets and intersections should be considered, including 156th Ave NE, Woodinville-Duvall Rd, and Wellington Hills Golf Course Rd.
16. Parking: The current plan shows minimal street widths with very limited or no on-street parking, which is not realistic considering the small lot sizes. Access, circulation and parking should be thoroughly investigated.
17. Post-Construction/Development Issues: The EIS should identify enforcement mechanisms to ensure that property owners do not either create new post-development environmental impacts, or offset any implemented mitigation measures. Examples of these types of issues include: additional clearing of vegetation adjacent to individual parcels; increased irrigation on steep slopes; and re-routing of drainage and stormwater runoff. These types of post-development activities by individual property owners could result in increased soil erosion

along steep slopes, creation or reactivation of landslides, and impairments to the function and operation of in-place stormwater conveyance and treatment systems.

Development of Alternatives

It is important to identify a range of alternatives that reduce or minimize the probable significant adverse impacts. The City has recently agreed on two additional alternatives (other than no-action and their current proposal) that are focused on providing new access connections to the site and neighborhood.: (1) provide access to Wood Trails from the west; (2) provide access to Wood Trails from the south. Other than providing new access routes, these do not address/mitigate any of the adverse impacts, and in fact, create additional adverse impacts of their own.

We suggest the City evaluate a number of alternatives such as the following.

- Recognize that reasonable alternatives will reduce environmental impact.
- Each of the sites needs to be analyzed for various types of development scenarios.
- The alternatives should not focus solely on design alternatives, but should include other land use options and residential densities.
- Include other alternatives that accomplish the objectives on properties owned by the applicant.
- Assess the repercussions to the applicant developing the parcels at R-1 densities as currently zoned.
- Consider an alternative where the City purchases the Wood Trails property.
- Evaluate short-term and long-term impacts to the neighborhood and built-out infrastructure, including funding scenarios or the necessary infrastructure improvements.
- Use a screening process that measures the pros and cons of each alternative.

Closure

This letter represents the concerns of the CNW, whose members include many of the individual residents whom have provided separate written comments to the City, or expressed their comments and concerns at the October 28 scoping meeting. Although this letter aims to capture many of the CNW members' concerns, this letter should not be viewed by the City as an all-encompassing summary of the Wellington residents' comments regarding the scope of the EIS and other related issues. As the City is aware, many individual comments were either recorded at the meeting and/or have been submitted separately in written correspondence to the City. The City should not disregard these individual comments or letters from the Wellington residents by assuming this letter incorporates all of their comments and concerns.

We trust that the City will review and evaluate our comments with the thoroughness and diligence needed to prepare a comprehensive EIS that fully addresses the Wellington area residents' concerns about the proposed projects and resulting impacts. We look forward to reviewing the formal scoping document that we expect you will prepare.

Please notify us of any developments or changes in the status of the EIS or the project applications. Thanks for your assistance and cooperation thus far in the process.

Sincerely,

Concerned Neighbors of Wellington

