



**Department of Community
Development**

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April 12, 2017

King County Dept. of Natural Resources and Parks
Attn: Gina Auld
201 South Jackson Street, Suite 700
Seattle, WA 98104-3855
gina.auld@kingcounty.gov

Hand Delivered

RE: East Lake Sammamish Trail Segment 2B SSDP2016-00415 – First review and request for additional information

Dear Ms. Auld,

This letter is to provide you initial comments, a request for additional information, and a status update on your project, East Lake Sammamish Trail Segment 2B (SSDP2016-00415). As you are aware, this proposal was subject to a 30-day public comment period that ended on January 27, 2017 and generated hundreds of public comments. The public comments were transmitted via CD along with a comment summary matrix to King County Department of Natural Resources and Parks on March 22, 2017, which you picked up from Sammamish City Hall.

The City of Sammamish has reviewed the information submitted by King County Department of Natural Resources and Parks on October 19, 2016 and November 30, 2016. Additionally, City staff have reviewed all public and agency comments received. Please respond to and/or address each comment received, either through direct response to the comment, or by indicating how the issue(s) raised by the commenter has been addressed in the project plans. Similarly, if you contend the comment is outside of the scope of the SSDP permit review, please indicate why you believe that is the case. Below is a summary of comments received:

I. Summary of Comments Received:

A. Critical Areas:

- 1 • Concern over construction within a wetland buffer and/or stream buffer and how it will be protected
- 2 • Jurisdictional ditch #11 should be an underground ditch, it's a hazard
- 3 • Wetland 23C near station 378 should be evaluated by USACE and reconsidered
- 4 • Wetlands 23A & 23B, and jurisdictional ditch #14 are artificially created and do not require a buffer
- 5 • Re-evaluate Wetland 18C

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- 6 • Wetland 28A and unnamed Stream #28 are incorrect
- 7 • Creating unnecessary wetland buffer areas
- 8 • Trail should slope to allow water to access wetlands
- 9 • Concern of wetland elimination

B. Wildlife Habitat:

- 1 • Concern for existing wildlife
- 2 • Chain link fencing will prevent wildlife crossings
- 3 • Were bald eagles and osprey considered
- 4 • Drainage/dispersion areas should be on the east side of trail only

C. Survey:

- 1 • Incorrect property boundaries staked in multiple locations along trail
- 2 • Plan set does not show newly constructed residences or garages
- 3 • Houses/garages shown partially or entirely within staked ROW, how will they be affected

D. ROW/Ownership:

- 1 • Dispute with County ownership of ROW and survey boundaries
- 2 • Railroad only had prescriptive easement, underlying ownership is private
- 3 • Pechman ruling is under appeal

E. Stormwater/drainage:

- 1 • Concern over increased runoff, hard surfaces, and pollutants
- 2 • Keep storm piping sizing consistent and do not create unnecessary backup of water or flooding
- 3 • How will underground drainage systems be addressed
- 4 • When existing drainage exists on east side of trail, why create new drainage area on west side of trail
- 5 • County should work with City to address increased stormwater needs now and into the future; especially in Inglewood and Tamarack area
- 6 • Broken culverts exist under rail bed: unnamed streams #4 and #5
- 7 • Improve additional “creeks” for fish passage

F. Access:

- 1 • Creation of steeper driveways will not allow emergency vehicles and other large vehicles/trailers access to homes
- 2 • Concern emergency vehicles and other large vehicles/trailers will not be able to access residences
- 3 • Not aware of the County combining or eliminating driveways in the completed segments of trail to the north and south; explain why being done in this segment
- 4 • ADA access needs to be provided to both trail users and residents
- 5 • Provide assurances that access will be available to homes during construction and that driveways will not be damaged
- 6 • Provide designs for staircases to be changed/replaced
- 7 • How will mailboxes and parking areas be accessed if stairs that are shown as remove are not replaced along East Lake Sammamish Parkway
- 8 • How were the shared stair access scenarios determined
- 9 • Explain how access will be provided for residents during trail construction
- 10 • Acknowledge deeded easement for the Tamarack community beach access
- 11 • More public access points to the trail are needed; only three (3) currently exist for this segment.

G. Construction/Staging Area:

- 1 • Where will equipment be stored during construction
- 2 • Construction of trail should be completed in two phases for this segment to minimize

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- property owner disruption
- 3 • Need written approval from all property owners to use private driveways/roads for construction access

H. Parking:

- 1 • Re-design rockeries/walls to allow for more resident parking
- 2 • Concern over removal of existing residential parking, both shared and individual areas – will there be a net loss in residential parking

I. Clearing and Grubbing Limits:

- 1 • Clearing and grubbing limits are not designated for a portion of this plan set
- 2 • How will structures be protected during construction when clearing and grubbing limits abut a structure
- 3 • Reduce width of clearing and grubbing limits

J. Trail Width/Location:

- 1 • Explain reasoning for proposed trail alignment
- 2 • Trail should not be improved outside existing footprint
- 3 • Use existing trail centerline for alignment as it reduces need for some additional retaining walls and lowers construction costs
- 4 • Do not move trail to the west, many trees and wetlands can be avoided if trail is not moved west
- 5 • Use 10 foot width for trail as AASHTO recommends

K. Structures:

- 1 • Will existing structures located in clearing and grubbing limits be removed
- 2 • Provide more details on proposed “rest stops”

L. Safety:

- 1 • County needs to protect homeowners from liability created from trail
- 2 • Who is patrolling trail, enforcing cyclist speed limit and preventing trespassing on private property
- 3 • Trail improvements will increase risk to home owners of vandalism, theft and trespass
- 4 • Will homeowners be allowed to install security gates that align with the chain link fence installed by the County
- 5 • Will homeowners be allowed to install their own fencing in place of or behind County’s proposed chain link fence
- 6 • Install signage to keep cyclists off of private driveways
- 7 • Proposed 4 foot high fence does not prohibit unauthorized access to each side of trail
- 8 • Replace existing fences upon construction completion
- 9 • Trail design should include measures to reduce speed of cyclists
- 10 • Paint a centerline on trail
- 11 • Hydrants need to remain accessible at all times
- 12 • Concerned with integrity of hillside once construction begins
- 13 • How will icy conditions on the trail be addressed, specifically black ice

M. Trees:

- 1 • What is the plan for tree retention and minimal tree damage during construction
- 2 • Narrow trail to retain trees and shrubs where able
- 3 • Many healthy, significant, and old growth trees proposed to be removed and should be retained
- 4 • Shift trail appropriately to retain healthy significant trees throughout segment

N. Landscaping/Aesthetics:

- 1 • Will homeowners be allowed to plant new/replace landscaping after trail complete
- 2 • Replace chain link fence with split rail fence, which exists on other completed portions of

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- the trail
- 3 • Use rockeries instead of concrete walls
- 4 • Use concrete treatment on concrete walls similar to other segments
- O. Signage:
 - 1 • Need to designate what is private property
- P. Utilities:
 - 1 • Locate and do not disturb existing water/sewer/power/telephone/cable etc. utilities already existing under and/or above ground
 - 2 • Update plan set to show all existing utilities/infrastructure
- Q. Privacy:
 - 1 • Will locking gates be added to staircases to maintain privacy
 - 2 • Replace landscaping for privacy and noise reduction

Staff Review and Comments:

Please review and respond to the attached comments (attached in the form of a letter or memo to the file) from City of Sammamish Public Works Department, the East Side Fire and Rescue District, and Sammamish Plateau Water and Sewer District. Each issue/item identified within these letters/memos must be addressed. They have been included in the format submitted by the reviewer to ensure the technical content is retained. Similarly, the City of Sammamish Department of Community Development and the City of Sammamish Parks & Recreation Department have the provided comments which are incorporated directly into this letter for your response. In addition to responding to each issue/item included in the attached discipline review letters, please also respond directly to each issue/item listed below.

II. Department of Community Development – Lindsey Ozbolt, Associate Planner, P: 425.295.0527, E: lozbolt@sammamish.us

A. Trail Design:

Staff has reviewed all application materials, public comments, and walked the site. Based on the current landscape of the area and the fact that this project is located within the Shoreline Jurisdiction of Lake Sammamish, it is important to address how the clearing and grubbing activity is limited so as to minimize the adverse impacts on the ecological functions and values of Lake Sammamish as discussed in the policies of the City’s Shoreline Master Program (SMP).

- 1 • A majority of the proposed trail facility is located within the City of Sammamish Shoreline Jurisdiction as established by the City of Sammamish Shoreline Master Program (SMP) under Title 25 of the City of Sammamish Municipal Code (SMC). The proposed trail facility also crosses through numerous sensitive landscape features (stream and wetlands and associated buffers) that qualify as Environmentally Critical Areas under SMC 21.50. Under guidance established by City of Sammamish Comprehensive Plan policies, both Shoreline Jurisdiction resources and Environmentally Critical Areas resources are regulated with the purpose of avoiding, minimizing, and mitigating impacts from development and land uses by requiring permit applicants and project designers to consider and apply mitigation sequencing to their projects. While the application materials provided with the application for Shoreline Substantial Development Permit (SSDP) in support of the proposed trail facility do appropriately (with some required revisions/corrections – see below) identify sensitive features, such as shoreline resources, streams, wetlands, trees, and existing vegetation, the application does not include an adequate description of how the project complies with the requirement that Mitigation Sequencing be considered and applied during project design. For example, what design

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II. A.

considerations and accommodations were made to avoid and minimize impacts to shoreline resources, streams, wetlands, trees, and existing vegetation? Please provide a mitigation sequencing compliance narrative that addresses each instance where the proposed trail facility intersects with a shoreline resource, stream, or wetland and also considers trees, and existing vegetation and describes what the design objectives were and what alternatives were considered. The narrative must clearly demonstrate in each of these instances why avoidance was not possible. The narrative must also clearly demonstrate how, when avoidance was not possible, impacts were minimized through design and how appropriate mitigation is provided.

- 2 • Consistent with the comment above, and consistent with SMC 21A.30.210(3) and 25.06.020(5), please provide further explanation and documentation as to how the proposed width of the clearing and grading limits is the minimum necessary consistent with the standards and requirements in the SMC. Please provide this in the form of a design considerations narrative that describes project objectives and how the proposed clearing and grading limits are the minimum necessary given the project objectives/requirements. Please indicate in the required narrative how the proposed design and clearing and grading limits are consistent with the findings of the project EIS as well as the standards and requirements of the SMP, SMC, and AASHTO guidelines along with what design flexibilities were considered in meeting these code requirements.
- 3 • The AASHTO recommended minimum paved width for a two-directional shared-use path is 10 feet. Please evaluate this trail segment (2B) with the consideration of reducing the width from 12 feet to 10 feet for longer segments or in specific locations where applicable to address public concerns and to meet the shoreline and critical areas mitigation sequencing requirements described above. Please include a summary of this evaluation in the required mitigation sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing.
- 4 • AASHTO also allows for a reduction to eight (8) feet of paved trail width for short distances when physical constraints cannot be sufficiently mitigated. Please evaluate this trail segment (2B) with the consideration of reducing trail width to eight (8) feet where applicable to address concerns regarding constraints and to meet shoreline and critical areas mitigation sequencing requirements described above. Please include a summary of this evaluation in the required mitigation sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing.
- 5 • In areas where fences or retaining walls will exist in conjunction with environmental or design constraints, AASHTO allows for a minimum of one (1) foot clearance instead of three (3) feet (two foot shoulder and one foot clear zone). Please evaluate this trail segment (2B) with the consideration of reducing the clearance to one (1) foot where applicable to address concerns regarding constraints and to meet shoreline and critical areas mitigation sequencing requirements described above. Please include a summary of this evaluation in the required mitigation sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing.
- 6 • In addition to narrowing the trail where possible as described above, please also consider the use of yellow centerline striping to indicate where bicyclist passing is permitted. The use of a solid yellow line indicates where passing is not allowed and broken yellow lines indicate where passing is allowed. This may allow for narrowing of the trail in specific areas while still meeting trail design safety objectives. Please include analysis regarding use of this safety feature and if it is infeasible explain why in the required mitigation

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II. A.

sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing. If use of this safety feature is feasible, it should help facilitate narrowing the trail as described above and will help demonstrate compliance with the mitigation sequencing requirements.

- 7 • Please provide updated trail use projections that were used in assumptions supporting design.
- 8 • Please provide a narrative describing how trail use projections have changed from projections made in the project EIS.

II. B. Shoreline Jurisdiction:

In multiple locations (approximate stations 328+00 to 335+00, 340+00 to 344+00, 351+00, 357+00, 374+00, 456+00, & 465+00) of Segment 2B, the existing interim trail and proposed expanded permanent trail is located within the 50 foot shoreline setback.

- 1 • Please provide written justification as to how the proposed plan complies with SMC 25.06.020(9) and “Table 25.06.020: Lake Sammamish Shoreline Setback Reductions.” Alternatively explain how there is no feasible alternative to avoid development within the 50 foot shoreline setback consistent with SMC 25.07.90 and 25.07.100. Please provide a mitigation sequencing compliance narrative that addresses each instance where the proposed trail facility intersects with a required shoreline setback and describe what the design objectives were and what alternatives were considered. The narrative must clearly demonstrate in each of these instances why avoidance was not possible. The narrative must also clearly demonstrate how, when avoidance was not possible, impacts were minimized through design and how appropriate mitigation is provided. The narrative must also describe how the proposed design is compliant with the code citations referenced in this paragraph.

II. C. Critical Areas and Wildlife Habitat:

The Watershed Company, on behalf of the City, reviewed the Critical Areas Study (CAS) submitted in October of 2016 and conducted site visits in February 2017 for field verification. Based on this review and the requirements of Sammamish Municipal Code please update the CAS and plan set as necessary after re-evaluating the following:

- 1 • Critical Area designations & Classifications:
 - a ○ Review and address the field observations and associated recommendation in Table 1 of the Watershed Company Environmental Peer Review Report dated March 22, 2017 (“Watershed Report”) and attached to this letter. Each issue/item identified within this letter/memo must be addressed. The letter/memo has been included in the format submitted by the reviewer to ensure the technical content is retained.
 - b ○ Update the CAS to include and/or clarify jurisdictional ditch methodology used and update findings and plans as necessary where considering jurisdictional ditches to be wetlands. The status of these features as wetland or ditch may impact trail design where an incorrect wetland determination has been made for a jurisdictional ditch that has influenced trail alignment and design. If features are found to be considered jurisdictional ditches as opposed to wetlands, please adjust trail alignment and design accordingly.
 - c ○ Review and report on the wetland rating category discrepancies identified in Table 2 of the Watershed Report.
 - d ○ Review the ratings of Wetlands 22E and 28D with respect to the very small wetlands guidance (Ecology Publication 04-06-025).
 - e ○ Review Stream 12 for potential typing (currently piped).

II. C.

- f ○ Add pileated woodpecker to the Fish and Wildlife Habitat Conservation Areas sections of the CAS and include required design modifications to account for protection of pileated woodpecker habitat.
- 2 • FEIS Review:
 - a ○ Update the CAS to be consistent with the EIS and include a summary of mitigation commitments and potential additional mitigation measures for fisheries, wetlands and vegetation, and wildlife.
 - b ○ Provide an explanation for each mitigation commitment and potential additional measure regarding how it is addressed in the proposed impacts and mitigation planning.
 - c ○ Demonstrate consistency with the EIS.
- 3 • Mitigation Approach:
 - a ○ Update the CAS for consistency with FEIS conclusions.
 - i ▪ Update the mitigation sequencing section of the CAS with a more thorough avoidance, minimization, and compensatory mitigation analysis that is reflective of FEIS conclusions. See comments above under Trail Design.
 - ii ▪ Avoidance: The submittal needs to address design strategies not covered in the CAS specifically the use of a board walk, curving of the trail, and narrower trail segments. See comments above under Trail Design.
 - iii ▪ Minimization: Additional minimization must be considered, such as “necking-down” or narrowing trail segments. See comments above under Trail Design.
 - iv ▪ Compensatory Mitigation: the submittal needs to address offsite compensatory mitigation options, such as the King County Mitigation Reserves Program (“MRP”), in the CAS. As concluded in the FEIS (Volume I, Section 3.3.7), mitigation banking would yield greater ecological value for this linear project. Mitigation is proposed at 21 sites along the 3.5 mile trail segment. Review and revise or support the proposed mitigation design. Include rationale for why mitigation banking or use of the King County MRP are not appropriate. Provide a detailed assessment documenting how the proposed mitigation will maintain critical area functions and values. See comments above under Trail Design.
 - b ○ Review and revise proposed buffer addition areas for consistency with Sammamish Municipal Code. Buffer addition areas must be continuous with a wetland or stream.
 - c ○ Permanent wetland impacts need to be distinguished from temporary wetland impacts on the critical areas impact figures plan set. Currently, this is unclear.
 - d ○ Bald eagle nest protections require USFWS consultation and more detailed mitigation planning.
 - e ○ The mitigation plan notes (sheet LA23) do not match the CAS report text. This must be updated accordingly.
 - f ○ Performance Standard recommendations (CAS Section 5.4.2):
 - i ▪ Wetlands: 1) A plant species diversity standard for trees, shrubs, and groundcover is recommended. 2) The survival, diversity, and cover standards must indicate whether native volunteers are counted.
 - ii ▪ Streams: 1) Habitat elements need to be quantified and mapped on the landscape plan or as-built to facilitate quantitative monitoring. 2) Provide an explanation for limiting performance monitoring for this standard to only three years as proposed.
 - iii ▪ Buffers/Setbacks: A plant species diversity standard for trees, shrubs, and groundcover is recommended.
 - iv ▪ Invasive Species: 1) Provide a justification for the proposed 20 percent invasive plant cover standard; typically a 10 percent standard is applied on most projects. 2) Recommend making an allowance for higher cover in riparian areas.

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canarygrass monocultures as long as plant driplines are maintained.

- v ■ Wildlife Habitat: 1) Issue a standard to ensure conifer trees are established between the trail and the bald eagle nest near SE 8th Street. 2) Set a quantifiable standard for habitat features.

- g ○ Provide a more detailed description of the contingency measures the County will implement if wetland creation and/or other proposed mitigation areas are unsuccessful.

4 • Shoreline Regulations:

- a ○ To better demonstrate consistency with the City's SMP, the CAS must include more specific information about how impacts on shoreline ecological functions are avoided and minimized. See comments above under Trail Design.
- b ○ The CAS must articulate how no net loss of shoreline ecological functions is achieved for other areas within shoreline jurisdiction, but outside of the shoreline setback, that provide shoreline ecological functions. To assist with this, all features contributing to shoreline ecological functions in the project area must be identified. Depictions of project critical area impacts must include a line indicating the landward extent of shoreline jurisdiction. Project impacts to features that may affect shoreline ecological functions must be identified on impact maps.
- c ○ The CAS must address how the proposed mitigation for impacts to shoreline features will ensure no net loss of shoreline ecological functions.

D Trees:

Trees are an important resource within the City of Sammamish. The County provided tree preservation plan sheets in October of 2016 and has tagged trees within the project area as observed by City Staff on a site visit conducted in early April 2017, however an Arborist Report has not been provided as required by SMC. Although SMC 21A.37.230(b) allows for an exemption from City approval when removing significant trees in public rights-of-way, written assessment performed by a qualified professional for the removal and retention of trees and other landscaping needs to be provided consistent with the SMP and SMC.

- 1 • Pursuant to SMC 21A.37.230 a Certified Arborist shall prepare a written evaluation. The written evaluation or report shall include all trees and landscaping; indicate which significant trees are to be saved, monitored, and removed pursuant to SMC 21A.37 and SMC 25.06, and provide a replanting plan. Please provide an Arborists Report compliant with these code sections.

E Maintenance:

Numerous comments were provided from the public regarding maintenance of the trail and associated facilities. Upon completion of Staff's review of the application materials, it is not clear that maintenance of the trail or associated facilities has been addressed.

- 1 • Provide information regarding the anticipated maintenance schedule for the trail and associated facilities pursuant to SMC 21A.30.220.

F Ownership:

Numerous comments were provided from the public regarding ownership. Although the County provided sufficient information to the City regarding ownership it would be beneficial if a written narrative that is easy to understand to the layperson and less technical were provided in addition to the information already received.

- 1 • Please provide a narrative regarding the history and current ownership of the Trail ROW as it relates to the real property include in this proposal. Please work with a public

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relations professional to ensure the narrative, which should tell the story behind the establishment of the rail corridor, the abandonment of the rail use, the rail-banking, the conversion to an interim trail, and the development of the current proposed trail, is understandable by the average community member. This narrative will be very helpful in clarifying the ownership questions that have been raised through public comment.

III. Parks & Recreation Department: - Angie Feser, Parks & Recreation Director, P: 425.295.0580, E: afeser@sammamish.us

- A • Driveways, road transitions, public access points:
 - 1 ○ Engineering review of driveway and road transitions should occur. The trail cross slope in general is being reduced, and this has led to driveway transition issues for some properties on the north segment.
 - 2 ○ Designate appropriate and adequate public access points to avoid public usage of private driveways. It is not currently designated on the plan set where the public access points will be located. Citizens should be able to review and comment on these locations. Adequate signage should also be provided.
- B • Coordination with city non-motorized planning:
 - 1 ○ The City's adopted Trails, Bikeways and Paths Plan has several planned non-motorized routes running east-west with connections to the East Lake Sammamish Parkway. These are in the vicinity of SE 24th Street, SE 8th Street and SE 32nd Street. Public access points should be designated with consideration given to these routes to facilitate connection to the ELST.
- C • The City is also beginning work on two plans updating non-motorized planning in the City.
 - 1 An update of the Parks, Recreation and Open Space Plan is currently in process with an estimated completion in March 2018. A Transportation Master Plan is proposed to begin Spring 2017 and is anticipated to take 2 years to reach adoption. Both of these plans will incorporate non-motorized transportation. Additional coordination may be possible, depending upon trail schedule with these City plans.
- D • Visual screening:
 - 1 ○ Where vegetation removal is unavoidable, it is recommended that replanting be provided where possible to reduce visual impacts for neighboring residences.

Public Works Department: - Haim Strasbourger, Development Review Engineer, P: 425.295.0562, E: rstrasbourger@sammamish.us

Please see the attached Public Works Memo dated March 27, 2017 and marked up plan sheet. Each issue/item identified within this letter/memo must be addressed.

East Side Fire and Rescue: - Jeff Werre, Assistant Fire Marshal, P: 425.313.3324, E: jwerre@ESF-R.org

Please see the attached memorandum from Eastside Fire and Rescue dated March 29, 2017. Each issue/item identified within this letter/memo must be addressed.

Sammamish Plateau Water: - Kyle Wong, Engineering Manager, P: 425.392.6256, E: kyle.wong@spwater.org

Please see the attached letter and marked up plan set from Sammamish Plateau Water dated January 27, 2017. Each issue/item identified within this letter/memo must be addressed

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Project Status:

The City of Sammamish is notifying you that this application is considered pending until the above described items have been addressed and/or more information is provided to the City as required. Pursuant to SMC 20.05 .100(1) - Permit issuance. City Staff has a target of 120 days from the date an application is deemed complete to the time a decision is made, in this case because it is a Type 4 Land Use Permit, the City Staff will be making a Staff Recommendation to the Hearing Examiner. In the event that City Staff is unable to meet this target time limit, SMC 20.05.100(4) dictates that the applicant shall be provided written notice that includes a statement as to why the target time limits have not been met and an estimated date for issuance of the Staff Recommendation and Hearing Examiner Decision. The formal notice is attached to this letter. Reasons as to why Staff is unable to meet the target 120 day time limit are as follows:

1. East Lake Sammamish Trail Segment 2B Shoreline Substantial Development Permit (SSDP2016-00415) is a complex proposal requiring City Staff to utilize specialized City Consultants to provide adequate technical review;
2. This is a high profile project within the City of Sammamish that has generated a high volume of public involvement through public comment, phone calls, and in person conversation;
3. This application process has changed from a Type 2 to a Type 4 process due to approval of Ordinance O2016-410 and final approval by the Department of Ecology of the changes to the City's Shoreline Master Program; and
4. At least one more staff review is anticipated with a potential additional information request to the County prior to issuance of a Staff Recommendation and setting of a hearing date before the City's Hearing Examiner.

Staff anticipates processing of this application will proceed as follows:

1. Once the County responds to this first review letter, Staff anticipates the need for 30 days to review the County's response and provide additional review letters if necessary. It is anticipated that each subsequent City review will take up to 30 days;
2. Upon completion of final City review, it is anticipated that it will take up to 30 days to draft and issue a Staff Recommendation to Hearing Examiner and issue Notice of Public Hearing; and
3. Public Hearing will begin no less than 14 days after the issuance of Staff Recommendation and Notice of Public Hearing.
4. It is anticipated that a decision will be made by the Hearing Examiner in Fall or Winter 2017.

Pursuant to SMC 20.05.100(4), written notice explaining the status of the target 120 day time limit and project status will be provided to the public within 14 days of this letter.

Re-submittal Date:

The City is authorized to set a reasonable deadline for the submittal of corrections, studies, or other information when requested pursuant to SMC 20.05.100. **Therefore, please submit the requested information within 90 days, which is no later than close of business on July 11, 2017.** Failure to meet the deadline may be the basis for the City to cancel the application due to inactivity. An extension of the deadline may be granted upon submittal, by the applicant, of a written request providing satisfactory justification of an extension.

Intake Appointment Required:

A formal re-submittal is required. Revisions, corrections, or studies prepared in response to this letter must be submitted in-person as one consolidated/bundled package and will not be accepted by mail, courier, or email. An intake appointment is **required** for submittal of all requested information and may be applied for here: <http://www.sammamish.us/permits-regulations/permits-inspections/intake-appointment-request/>. Please provide four (4) paper copies (unless a different number of paper copies is

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specifically referenced) and one (1) electronic version of all information submitted during the intake appointment. Information **will not** be accepted if submitted any other way than through an intake appointment.

If you have any questions regarding the information presented in this letter or regarding review of the project proposal, please contact me at 425.295.0527 or by email at lozbolt@sammamish.us.

Sincerely,



Lindsey Ozbolt
Associate Planner
Community Development Department
City of Sammamish
425-295-0527
lozbolt@sammamish.us

Enclosures: (all provided on CD only)

- Public Comments
- Public Comments matrix
- Agency Comments
- Staff Comments
- The Watershed Company – Segment 2B – Environmental Peer Review Report, dated March 22, 2017
- Notice of 120 Day Clock Exceedance for Shoreline Substantial Development Permit (SSDP) East Lake Sammamish Segment 2B – SSDP2016-00415.
- Status of East Lake Sammamish Trail Inglewood Hill Parking Lot Shoreline Substantial Development Permit (SSDP2016-00415), dated April 12, 2017

cc:

Jeff Thomas, Community Development Director	<i>via email</i>
David Pyle, Community Development Deputy Director	<i>via email</i>
Steve Leniszewski, Public Works Director	<i>via email</i>
Haim Strasbourger, Development Review Engineer	<i>via email</i>
Tawni Dalziel, Public Works Senior Stormwater Program Manager	<i>via email</i>
David Linehan, Kenyon Disend, PLLC	<i>via email</i>
Kim Pratt, Kenyon Disend, PLLC	<i>via email</i>
Frank Overton, King County Parks Capital Project Managing Supervisor	<i>via email</i>
Jenny Bailey, Parametrix Project File	<i>via email</i>

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East Lake Sammamish Trail Segment 2B SSDP2016-00415

I. Summary of Public Comment Received		
Item/Topic	City of Sammamish Comments	King County Responses
A.	Critical Areas	
1	'- Concern over construction within a wetland buffer and/or stream buffer and how it will be protected.	King County is required by local, state, and federal regulations to avoid and minimize impacts to environmentally critical areas (see Mitigation Sequency Compliance Narrative in Tab 6). Any unavoidable construction with wetland or stream buffers will be reviewed and permitted by the City of Sammamish and compensatory mitigation will be provided as required by Sammamish Municipal Code (SMC). To protect adjacent critical areas during construction, King County delineates its clearing and construction limits with appropriate fencing and implements Temporary Erosion and Sedimentation Control (TESC) measures along the perimeter. Please refer to the Revised Critical Areas Study (CAS), dated July 2017.
2	Jurisdictional ditch #11 should be an underground ditch, it's a hazard.	The open conveyance of stormwater in ditches, rather than pipes, offers the benefit of allowing some stormwater to infiltrate to ground. The vegetation in and around the ditches can filter sediment from the water and slow the velocity of the water. Where ditches occur close to the trail, King County typically installs split rail fence to delineate the feature.
3	Wetland 23C near Station 378 should be reviewed by USACE and reconsidered.	This project complies with all environmental laws and regulations, including those governing wetlands. Wetlands, streams and ditches are identified and delineated by the project scientists (wetland biologists) using city, state, and federal environmental regulations and guidance. Over the last 16 years, the environmental conditions along the East Lake Sammamish Corridor have been thoroughly assessed and investigated. The findings for South Sammamish Segment B are documented in the Critical Areas Study (Revised Critical Areas Study - East Lake Sammamish Master Plan Trail - South Sammamish Segment B, July 2017, Parametrix), incorporated herein by reference. The Critical Areas Study provides a detailed discussion and analysis of the critical areas including wetlands. The federal, state and city permitting agencies which regulate wetlands, streams, and certain ditches review, verify, and make the final determination on these features during permit review. For example, the City of Sammamish conducted a third party field review of the County's designations and have provided comments regarding some of these features. King County has reviewed and responded to those specific comments in Tab 2. Please note that the City's review did not change King County's designation of any of the resources specifically identified in public comments. When King County submits a Joint Aquatic Resources Permit Application to the U.S. Army Corps of Engineers (later this summer), the Corps will also review the County's findings.
4	Wetlands 23A & 23B, and jurisdictional ditch #14 are artificially created and do not require a buffer.	See response to Item I.A.3 above.
5	Re-evaluate Wetland 18C.	See response to Item I.A.3 above.
6	Wetland 27A and Unnamed Stream #28 are incorrect.	See response to Item I.A.3 above.
7	Creating unnecessary wetland buffer areas.	After implementing avoidance and minimization to the project, King County is required to provide mitigation to compensate for any remaining unavoidable impacts. Additional wetland buffer areas are part of the proposed mitigation package. The City of Sammamish is reviewing that mitigation proposal and will make a decision on its adequacy in meeting code requirements.
8	Trail should slope to allow water to access wetlands.	King County is designing drainage for the trail in accordance with the King County Surface Water Design Manual and City of Sammamish 2016 Surface Water Design Manual Addendum ("Surface Water Manual"), the most current regulations that govern surface water management for development of property. The City of Sammamish will confirm compliance during the permit review process.
9	Concern of wetland elimination.	See response to Item I.A.3 above.

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
B. Wildlife Habitat			
1	Concern for existing wildlife	The impacts to wildlife resulting from this project have been considered and mitigation has been proposed and incorporated into the project plans. The Environmental Impact Statement (EIS) Section 3.4.6 outlines potential impacts to wildlife. Provisions for allowing wildlife passage at intervals along the trail include: the use of split rail fencing adjacent to environmentally sensitive areas such as wetlands and streams, intersecting driveways, and gaps between the fences. The EIS is available for review or download on the project website: www.kingcounty.gov/eastlakesammamishtrail . This project will result in significant benefits to fish and fish habitat as eight culvert improvements are proposed to accommodate fish passage through the corridor.	
2	Chain link fence will prevent wildlife crossings	Provisions for allowing wildlife passage at intervals along the trail include: the use of split rail fencing adjacent to environmentally sensitive areas such as wetlands and streams, intersecting driveways, and gaps between the fences. This approach is consistent with the EIS, as described above.	
3	Were bald eagles and osprey considered?	Yes. See response to Item I.B.1 above.	
4	Drainage/dispersion areas should be on the east side of the trail only	King County is designing drainage for the trail in accordance with the King County Surface Water Design Manual and City of Sammamish 2016 Surface Water Design Manual Addendum ("Surface Water Manual"), the most current regulations that govern surface water management for development of property. The manual addresses increases in run-off that result from the project. The City of Sammamish will confirm compliance during the permit review process.	
C. Survey			
1	Incorrect property boundaries staked at multiple locations along the corridor.	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Plan set does not show newly constructed residences or garages.	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
3	Houses/garages shown partially or entirely within the staked ROW, how will they be affected	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
D. ROW/ Ownership			
1	Dispute w/ KC ROW ownership and survey boundaries	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Railroad only had a prescriptive easement, underlying ownership is private	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
D. ROW/ Ownership (continued)			
3	Pechman ruling is under appeal	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
E. Stormwater/ Drainage			
1	Concern over increased run-off, hard surfaces, pollutants	King County is designing drainage for the trail in accordance with the King County Surface Water Design Manual and City of Sammamish 2016 Surface Water Design Manual Addendum ("Surface Water Manual"), the most current regulations that govern surface water management for development of property. The manual addresses increases in run-off that result from the project. The City of Sammamish will confirm compliance during the permit review process. Trails are non-pollutant-generating surfaces under the manual.	
2	Keep storm pipe sizing consistent and do not create unnecessary back up of water or flooding	The County will ensure that drainage structures on King County property are sufficient to accommodate the natural flow of water onto the ELST corridor. As part of the redevelopment of the ELST, King County has conducted an extensive analysis of the drainage/stormwater patterns in the area of the corridor. Obstructions or blockages identified within the County-owned corridor are being fixed. Downstream property owners are being notified if obstructions or blockages are identified downstream of the corridor. Downstream property owners have a duty to accommodate the natural flow of water onto their property. While property owners may replace natural drainage structures with a pipe or other artificial conveyance system, it must be sufficiently large to accommodate the natural flow of water. Once artificial structures are constructed, property owners have a continuing obligation to maintain them in good working order to ensure proper functioning of the drainage system.	
3	How will underground drainage systems be addressed	See response to Item I.E.1 above.	
4	When existing drainage exists on east side of trail, why create new drainage area on west side of trail	See response to Item I.E.1 above.	
5	County should work with City to address increased stormwater needs now and into the future; especially in Inglewood and Tamarack area	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
6	Broken culverts exist under rail bed: unnamed streams #4 and 5	See response to Item I.E.2 above.	
7	Improve additional "creeks" for fish passage	King County completed a thorough inventory of drainage structures across the corridor and identified eight culverts to be improved for fish passage. Please refer to the analysis provided in Tab 12 . These improvements will result in greater available habitat for fish.	
F. Access			
1	Creation of steeper driveways will not allow emergency vehicles and other larger vehicles/trailers access to homes	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Concern emergency vehicles and other large vehicles/trailers will not be able to access residences (due to steeper driveways and other changes)	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
F. Access (continued)			
3	Not aware of the County combining or eliminating driveways in the completed segments of trail in the north and south; explain why being done in this segment	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
4	ADA access needs to be provided to both trail users and residents	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
5	Provide assurances that access will be available to homes during construction and that driveways will not be damaged	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
6	Provide designs for staircases to be changed/replaced	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
7	How will mailboxes and parking be accessed if stairs that are shown as remove are not replaced along East Lake Sammamish Parkway	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
8	How were the shared stair access scenarios determined	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
9	Explain how access will be provided for residents during construction	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
10	Acknowledge deeded easement for the Tamarack community beach access	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
F. Access (continued)			
11	More public access points to the trail are needed; only three (3) currently exist for this segment.	Public access to the shoreline area is a shoreline issue. The trail is an opportunity to provide public access to the shoreline because it occurs within the shoreline area and it advances the Shoreline Management Act's goal of increasing access to the shoreline. Dating back to the Final EIS, King County has always intended to construct improvements for public access to the trail (and thus the shoreline). In final design and construction of each segment, King County has met this intent where appropriate and safe. It is important to note that beyond the County-owned corridor, the City of Sammamish has jurisdiction and can make improvements to city facilities that impede or expand access to the shoreline. While King County can provide access from the trail to the Parkway, it is the City's responsibility to make commensurate improvements to allow the public to continue along and across the Parkway, where necessary. In the South Sammamish Segment B, four access points were identified in the environmental impact statement. Public access at the southern terminus (SE 33rd Street) is being constructed as part of South Sammamish Segment A. Public access at the northern terminus (Inglewood Hill Road) will be constructed as part of a separate parking lot project. A third public access point at Louis Thompson Road will be constructed in conjunction with Segment B. A fourth public access point at SE 8th Street will be constructed in the future, in coordination with City of Sammamish improvements along and across East Lake Sammamish Parkway.	
G. Construction/ Stage Area			
1	Where will equipment be stored during construction	Potential staging areas for the construction contractor to consider have been added to the TESC Plan (part of the Revised 60-percent Plans).	
2	Construction of the trail should be completed in two phases for this segment to minimize property owner disruption	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
3	Need written approval from all property owners to use private driveways/roads for construction access	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
H. Parking			
1	Redesign rockeries/walls to allow for more resident parking	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Concern over removal of existing resident parking, both shared and individual areas -- will there be a net loss in residential parking	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
I. Clearing and Grubbing Limits			
1	Clearing and grubbing limits are not designated for a portion of the plan set	The plan and profile (AL) sheets show clearing and grubbing limits throughout Segment B.	
2	How will structures be protected during construction when clearing and grubbing limits abut a structure	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
3	Reduce width of clearing and grubbing limits	King County uses criteria in the Washington State Department of Transportation Construction Manual to establish clearing and grubbing limits. Specifically, Chapter 2 Section SS 2-01.3(1) Clearing states: "Where slope treatment is provided clearing should normally be staked to a distance of 10 feet beyond the limits of the slope treatment with a distance of 5 feet being considered the absolute minimum distance required." Section SS 2-01.3(2) Grubbing states: "The clearing and grubbing limits shall be 5 feet beyond the toe of a fill and 10 feet beyond the top of a cut unless otherwise shown in the Plans." Where retaining walls are proposed to minimize trail footprint, the clearing and grubbing limits are typically shown at 10 feet beyond the base of a fill wall and top of a cut wall.	
J. Trail Width/ Location			
1	Explain reasoning for proposed trail alignment	See response to City comment II.A.1 through 8	
2	Trail should not be outside existing footprint	See response to City comment II.A.1 through 8	
3	Use existing trail centerline for alignment as it reduces need for some additional retaining walls and lowers construction cost	See response to City comment II.A.1 through 8	
4	Do not move the trail to the west, many trees and wetlands can be avoided if the trail is not moved west	See response to City comment II.A.1 through 8	
5	Use 10 foot width for trail as AASHTO recommends	See response to City comment II.A.1 through 8	
K. Structures			
	Will existing structures within the clearing and grubbing limits be removed	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
	Provide more details on proposed "rest stops"	The Revised 60-percent Plans shows two types of rest stops: Type 1 and Type 2. Type 1 rest stops features benches. Type 2 rest stops feature picnic tables. Details are also provided in the Revised 60-percent Plans.	
L. Safety			
1	County needs to protect homeowners from liability from trail	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
L.	Safety (continued)		
2	Who is patrolling trail, enforcing cyclist speed limit and preventing trespassing on private property	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
3	Trail improvements will increase risk to homeowners of vandalism, theft and trespass	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
4	Will homeownerx be allowed to install security gates that align with the chain link fence installed by the County	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
5	Will homeowners be allowed to install their own fencing in place of or behind County's proposed chain link fence	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
6	Install signage to keep cyclists off private driveways	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
7	Proposed 4 foot high fence does not prohibit unauthorized access to each side of trail	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
8	Replace existing fences upon construction completion	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
9	Trail design should include measures to reduce the speed of cyclists	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
10	Paint a centerline on trail	See response to City Comment II.A.6.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
L. Safety (Continued)			
11	Hydrants need to remain accessible at all times	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
12	Concern with integrity of hillside once construction begins	The ELST is designed to meet the highest safety standards and is compliant with the City code requirements. With regard to the integrity of the hillside, this matter is addressed in the City's critical areas code for geologic hazard areas. These areas include steep slopes, and erosion and landslide hazard areas. King County has responded to the City's associated requirements by providing a geotechnical report.	
13	How will icy conditions on trail be addressed, specifically black ice	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
M. Trees			
1	What is the plan for tree retention and minimal tree damage during construction	<p>This project is designed with the goal of enhancing the shoreline and natural environment and preserving trees whenever possible. King County Parks shares your sentiment regarding preserving existing trees and our policy is to avoid impacting significant trees whenever possible. However, there are a number of factors that determine the trail alignment including building the trail within a narrow corridor, steep terrain, and avoiding impacts to environmentally sensitive areas as required by state, local, and federal regulation. Meeting these criteria does require removing some trees to build a trail that is safer and more accessible to people of all ages and abilities. King County's maintenance team only removes trees that are unhealthy or pose a safety risk to the public. The County's contractor only will remove the trees necessary to build the trail.</p> <p>As defined in the Sammamish Municipal Code, significant trees are coniferous trees with a diameter of 8 inches or greater and deciduous trees with a diameter of 12 inches or greater at breast height (DBH), or approximately 4 ½ feet above ground. There were over 800 significant trees identified by a qualified arborist in South Sammamish Segment B. Of these significant trees assessed by the arborist, 273 significant trees will be removed.</p> <p>During construction, fencing on the limits of construction will protect trees outside the limits. Following construction, King County will replant areas that are temporarily disturbed.</p>	
2	Narrow trail to retain trees and shrubs where able	See response to City comment II.A.1 through 8	
3	Many healthy, significant, and old growth trees proposed to be removed and should be retained	See response to City Comment I.M.1 above	
4	Shift trail appropriately to retain healthy significant trees throughout the segment	See response to City comment II.A.1 through 8	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
N. Landscaping/ Aesthetics			
1	Will homeowners be allowed to plant new/replace landscaping after construction complete	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Replace chain link fence with split rail fence, which exists in other completed portions of the trail	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
3	Use rockeries instead of concrete walls	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
4	Use concrete treatment on concrete walls similar to other sections	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
O. Signage			
1	Need to designate what is private property	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
P. Utilities			
1	Locate and do not disturb existing water/sewer/power/telephone/cable etc. utilities already existing under and/or above ground	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Update plan set to show all existing utilities/infrastructure	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	

I. Summary of Public Comment Received (continued)			
Item/Topic	City of Sammamish Comments	King County Responses	
Q.	Privacy		
1	Will locking gates be added to staircases to maintain privacy	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
2	Replace landscaping for privacy and noise reduction	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.	
II. Comments from the Department of Community Development			
Item/Topic	City of Sammamish Comments	King County Responses	
A.	Trail Design		
1	Mitigation Sequencing	<p>While the application materials provided with the application for Shoreline Substantial Development Permit (SSDP) in support of the proposed trail facility do appropriately (with some required revisions/corrections -- see below) identify sensitive features, such as shoreline resources, streams, wetlands, trees, and existing vegetation, the application does not include an adequate description of how the project complies with the requirement that Mitigation Sequencing be considered and applied during project design. For example, what design considerations and accommodations were made to avoid and minimize impacts to shoreline resources, streams, wetlands, trees, and existing vegetation? Please provide a mitigation sequencing compliance narrative that addresses each instance where the proposed trail facility intersects with a shoreline resource, stream, or wetland and also considers trees, and existing vegetation and describes what the design objectives were and what alternatives were considered. This narrative must clearly demonstrate in each of these instances why avoidance was not possible. The narrative must also clearly demonstrate how, when avoidance was not possible, impacts were minimized through design and how appropriate mitigation is provided.</p> <p>See Mitigation Sequencing Compliance Narrative (Tab 6). The second section of the narrative describes design considerations and accommodations to avoid and minimize impacts. The third section of the narrative details the implementation of these techniques as they relate to specific resources. The fourth section of the narrative explains why avoidance of all impacts was not possible. The fifth section discusses compensatory mitigation for unavoidable impacts.</p>	

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
A. Trail Design (continued)		
2	Clearing and Grading Limits	<p>Consistent with the comment above, and consistent with SMC 21A.30.210(3) and 25.06.020(5), please provide further explanation and documentation as to how the proposed width of the clearing and grading limits i the minimum necessary consistent with the standards and requirements in the SMC. Please provide thisin the form of a design considerations narrative that describes project objectives and how the proposed clearing and grading limits are the minimum necessary given the project objectives/requirements. Please indicate in the required narrative how the proposed clearing and grading limits are consistent with the findings or the project EIS as well as the standards and requirements of the SMP, SMC, and AASHTO guidelines, along with what design flexibilities were considered in meeting the code requirements.</p>
		<p>King County uses criteria in the Washington State Department of Transportation Construction Manual to establish clearing and grubbing limits. Specifically, Chapter 2 Section SS 2-01.3(1) Clearing states: "Where slope treatment is provided clearing should normally be staked to a distance of 10 feet beyond the limits of the slope treatment with a distance of 5 feet being considered the absolute minimum distance required." Section SS 2-01.3(2) Grubbing states: "The clearing and grubbing limits shall be 5 feet beyond the toe of a fill and 10 feet beyond the top of a cut unless otherwise shown in the Plans." In many areas, King County is proposing the use of retaining walls to reduce the limits of cuts and fills. Where retaining walls are proposed to minimize trail footprint, the clearing and gurbbing limits are typically shown at 10 feet beyond the base of a fill wall and top of a cut wall.</p>
3	Paved Width	<p>The AASHTO recommended minimum paved width for a two-directional shared-use path is 10 feet. Please evaluate this trail segment (2B) with consideration of reducing the paved width from 12 feet to 10 feet for longer segments or in specific locations where applicable to address public concerns and to meet the shoreline and critical areas mitigation sequencing requirements described above. Please include a summary of this evaluation in the required mitigation sequencing narrative described above an dupdate the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing.</p>
		<p>AASHTO provides recommendations regarding width but acknowledges the determination of width depends on the volume and types of use. Please see the additional analyses provided in :</p> <ul style="list-style-type: none"> - Tab 6 Mitigation Sequencing Compliance Narrativwe - Tab 7 Trail Demand Analysis -Tab 8 Trail Width Analysis
4	Paved Width	<p>AASHTO also allows for a reduction to eight (8) feet of paved trail width for short distances when physical constraints cannot be sufficiently mitigated. Please evaluate this segment (2B) with consideration of reducing the paved width from 12 feet to 8 feet where applicable to address concerns regarding constraints and to meet shoreline and critical areas mitigaion sequencing requirements described above. Please include a summary of this evaluation in the required mitigation sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing.</p>
		<p>AASHTO provides recommendations regarding width but acknowledges the determination of width depends on the volume and types of use. Please see the additional analyses provided in :</p> <ul style="list-style-type: none"> - Tab 6 Mitigation Sequencing Compliance Narrativwe - Tab 7 Trail Demand Analysis -Tab 8 Trail Width Analysis

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
A. Trail Design (continued)		
5	Clear Zones	In areas where fences or retaining walls will exist in conjunction with environmental or design constraints, AASHTO allows for a minimum of one (1) foot clearance instead of three (3) feet (two foot shoulder and one foot clear zone). Please evaluate this segment (2B) with consideration to reducing the clearance to one (1) foot where applicable to address concerns regarding constrains and to meet shoreline and critical areas mitigation sequencing requirements described above. Please include a summary of this evaluation in the required mitigation sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing.
		AASHTO provides recommendations regarding width but acknowledges the determination of width depends on the volume and types of use. Please see the additional analyses provided in : - Tab 6 Mitigation Sequencing Compliance Narrativwe - Tab 7 Trail Demand Analysis -Tab 8 Trail Width Analysis
6	Striping	In addition to narrowing the trail where possible as described above, please also consider the use of yellow centerline striping to indicate where bicyclist passing is permitted. The use of a solid yellow line indicates where passing is not allowed and broken yellow lines indicate where passing is allowed. This may allow for narrowing of the trail in specific areas while still meeting trail design safety objectives. Please include analysis regarding use of this safety feature and if it is infeasible explain why in the required mitigation sequencing narrative described above and update the plan set as necessary where narrowing of the trail is necessary for compliance with mitigation sequencing. If use of this safety feature is feasible, it should help facilitate narrowing the trail as described abofe and will help demonstrate compliance with the mitigation sequencing requirements.
		While there are practical applications for striping in certain situations, striping does not facilitate the narrowing of the trail. Please refer to the analysis provided in Tab 8 - Trail Width Analysis
7	Trail Use Projections	Please provide updated trail use projections that were used in assumptions supporting design.
		Please refer to the analysis provided in Tab 7 - Trail Demand Analysis
8	Trail Use Narrative	Please provide a narrative describing how trail use projections have changed from projections made in the project EIS.
		Please refer to the analysis provided in Tab 7 - Trail Demand Analysis

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
B. Shoreline Jurisdiction		
1 Setback Area	<p>In multiple locations of Segment 2B, the existing interim trail and proposed expanded permanent trail is located within the 50 foot shoreline setback. Please provide written justification as to how the proposed plan complies with SMC 25.06.020(9) and "Table 25.06.020: Lake Sammamish Shoreline Setback Reductions." Alternative explain how there is no feasible alternative to avoid development within the 50-foot shoreline setback consistent with SMC 25.07.90 and 25.07.100. Please provide a mitigation sequencing compliance narrative that addresses each instance where the proposed trail facility intersects with a required shoreline setback and describe what the design objectives were and what alternatives were considered. The narrative must also clearly demonstrate how, when avoidance was not possible, impacts were minimized through design and how appropriate mitigation is provided. The narrative must also describe how the proposed design is compliant with the code citations referenced in this paragraph.</p>	<p>To the extent that this comment requires the County to locate the trail outside of the ELST corridor in order to comply with SMC 25.06, this is preempted under federal law. The ELST is a railbanked corridor under the federal "Rails to Trails" legislation, 16 U.S.C 1247(d). In 1998, the Surface Transportation Board issued a Notice of Interim Trail Use ("NITU") for the ELST corridor declaring that "interim trail use may be implemented" on the ELST corridor. Any development regulation, including SMC 25.06, that requires placement of the trail outside of the ELST corridor is preempted under federal law.</p> <p>In the areas where the proposed trail is within the shoreline setback, changes to the alignment to move it outside the setback but still within the ELST corridor would introduce other impacts. As currently proposed, the trail encompasses the existing rail/interim use trail prism. Moving the trail away from the lake would require more earthwork and clearing, and would locate the trail closer to adjacent residences.</p> <p>The project complies with the public recreational use regulations (SMC 25.07.090) in that the trail will result in no net loss of shoreline ecological function (see narrative in Tab 9), will provide the public with visual and physical access to the shoreline, proposes picnic tables and benches for public enjoyment within the shoreline setback but outside critical areas, and emphasizes the use of native, self-sustaining vegetation.</p> <p>The project complies with the transportation use regulations (SMC 25.07.100) in that the trail is being designed to comply with the City of Sammamish's most current stormwater regulations; new or modified culverts are being designed according to applicable city and state standards; no shoreline stabilization is necessary; no new parking is proposed as part of South Sammamish Segment B; earthwork is minimized by encompassing the existing rail/interim use trail prism.</p> <p>King County's development of East Lake Sammamish Trail South Sammamish Segment B is in compliance with the City of Sammamish's mitigation sequencing hierarchy for both critical areas and shorelines. Please refer to the Mitigation Sequencing Compliance Narrative in Tab 6.</p>

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
C. Critical Areas and Wildlife Habitat		
1	Critical Area Designations & Classifications	
a	Review and address the field observations and associated recommendation in Table 1 of the Watershed Company Environmental Peer Review Report dated March 22, 2017 ("Watershed Report") and attached to this letter. Each issue/item identified within this letter/memo must be addressed. The letter/memo has been included in the format submitted by the reviewer to ensure the technical content is retained.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
b	Update the CAS to include and/or clarify jurisdictional ditch methodology used and update findings and plans as necessary where considering jurisdictional ditches to be wetlands. The status of these features as wetland or ditch may impact trail design where an incorrect wetland determination has been made for a jurisdictional ditch that has influenced trail alignment and design. If features are found to be considered jurisdictional ditches as opposed to wetlands, please adjust trail alignment and design accordingly.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
c	Review and report on the wetland rating category discrepancies identified in Table 2 of the Watershed Report.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
d	Review the ratings of Wetlands 22E and 28D with respect to the very small wetlands guidance (Ecology Publicatin 04-06-25).	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
e	Review Stream 12 for potential typing (currently piped).	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
f	Add pileated woodpecker to the Fish and Wildlife Habitat Conservation Areas sections of the CAS and include required design modifications to account for protection of pileated woodpecker habitat.	Per SMC 21A.50.325 , the Director may require a CAS to include "A discussion of any federal or state management recommendations, including WDFW habitat management recommendations, that have been developed for species or habitats located on or adjacent to the project area." As requested, King County has added pileated woodpeckers to the CAS. Please refer also to Tab 2.
2	FEIS Review	
a	Update the CAS to be consistent with the EIS and include a summary of mitigation commitments and potential additional mitigation measures for fisheries, wetlands and vegetation, and wildlife.	The purpose of the CAS is to comply with the City's critical area code. The content and mitigation commitments in the CAS meet that objective. A separate narrative is provided in Tab 10 that describes consistency with the State Environmental Policy Act (SEPA) as documented in the project EIS.
b	Provide an explanation for each mitigation commitment and potential additional measure regarding how it is addressed in the proposed impacts and mitigation planning.	Please refer to the SEPA narrative in Tab 10.

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
C. Critical Areas and Wildlife Habitat (continued)		
3	Mitigation Approach	
a	Update the CAS for consistency with the FEIS conclusions.	The purpose of the CAS is to comply with the City's critical area code. The content and mitigation commitments in the CAS meet that objective. A separate narrative is provided in Tab 10 that describes consistency with SEPA as documented in the project EIS.
i	Update the mitigation sequencing section of the CAS with a more thorough avoidance, minimization, and compensatory mitigation analysis that is reflective of the FEIS conclusions. See comments under Trail Design.	Please see specific responses to Trail Design comments, including the Mitigation Sequencing Compliance Narrative in Tab 6 . As noted in the narrative, the mitigation approach is consistent with the EIS and local regulatory requirements.
ii	Avoidance: The submittal needs to address design strategies not covered in the CAS specifically the use of a boardwalk, curving of the trail, and narrower trail segments. See comments above under Trail Design.	Please see responses to City Comment II.A.1 and see also Tab 6 Mitigation Sequencing Compliance Narrative.
iii	Minimization: Additional minimization must be considered, such as "necking down" or narrowing trail segments. See comments above under Trail Design.	Please see responses to City Comment II.A.1 and see also Tab 6 Mitigation Sequencing Compliance Narrative.
iv	Compensatory Mitigation: the submittal needs to address offsite compensatory mitigation options, such as the King County Mitigation Reserves Program ("MRP"), in the CAS. As concluded in the FEIS (Volume I, Section 3.3.7), mitigation banking would yield greater ecological value for this linear project. Mitigation is proposed at 21 sites along the 3.5 mile trail segment. Review and revise or support the proposed mitigation design. Include rationale for why mitigation banking or use of the King County MRP are not appropriate. Provide a detailed assessment documenting how the proposed mitigation will maintain critical area functions and values. See comments above under Trail Design.	Please see responses to City Comment II.A.1 and see also Tab 6 Mitigation Sequencing Compliance Narrative.
b	Review and revise proposed buffer addition areas for consistency with SMC. Buffer addition areas must be continuous with a wetland or stream.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2 .
c	Permanent wetland impacts need to be distinguished from temporary on the plan set.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2 .
d	Bald eagle nest protections require USFWS consultation and more detailed mitigation planning.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2 .
e	The mitigation plan notes (sheet LA23) do not match the CAS report text.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2 .
f	Performance standard recommendations (CAS Section 5.4.2):	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2 .
i	Wetlands: 1) A plan species diversity standard for trees, shrubs, and groundcover is recommended. 2) The survival, diversity, and cover standards must indicate whether native volunteers are counted.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2 .

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
C. Critical Areas and Wildlife Habitat (continued)		
ii	Streams: 1) Habitat elements need to be quantified and mapped on the landscape plan or as-built to facilitate quantitative monitoring. 2) Provide an explanation for limiting performance monitoring for this standard to only three years as proposed.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
iii	Buffers/Setbacks: A plant species diversity standard for trees, shrubs, and groundcover is recommended.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
iv	Invasive Species: 1) Provide a justification for the proposed 20 percent invasive plant cover standard; typically a 10 percent standard is applied on most City projects. 2) Recommend making an allowance for higher cover in existing reed canarygrass monocultures as long as plant driplines are maintained.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
v	Wildlife Habitat: 1) Issue a standard to ensure conifer trees are established between the trail and the bald eagle nest near SE 8th Street. 2) Set a quantifiable standard for habitat features.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
g	Provide a more detailed description of the contingency measures the County will implement if wetland creation and/or other proposed mitigation areas are unsuccessful.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
4	Shoreline Regulations	
a	To better demonstrate consistency with the City's SMP, the CAS must include more specific information about how impacts on shoreline ecological functions are avoided and minimized. See comments above under Trail Design.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
b	The CAS must articulate how no net loss of shoreline ecological functions is achieved for other areas within shoreline jurisdiction, but outside of the shoreline setback, that provide shoreline ecological functions. To assist with this, all features contributing to shoreline ecological functions in the project area must be identified. Depictions of project critical area impacts must include a line indicating the landward extent of shoreline jurisdiction. Project impacts to features that may affect shoreline ecological functions must be identified on impact maps.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.
c	The CAS must address how the proposed mitigation for impacts to shoreline features will ensure no net loss of shoreline ecological functions.	King County has reviewed the detailed comments provided by the Watershed Company and responded to each item. Please refer to those responses in Tab 2.

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
D.	Trees	
	<p>1</p> <p>Trees are an important resource within the City of Sammamish. The County provided tree preservation sheets in October 2016 and has tagged trees within the project area as observed by City Staff on a site visit conducted in early April 2017, however an Arborist Report has not been provided as required by the SMC. Although SMC 21A.37.230(b) allows for an exemption from City approval when removing significant trees in public rights-of-way, written assessment performed by a qualified professional for the removal and retention of trees and other landscaping needs to be provided consistent with the SMP and SMC. Pursuant to SMC 21A.37.230 a Certified Arborist shall prepare a written evaluation. The written evaluation or report shall include all trees and landscaping; indicate which significant trees are to be saved, monitored, and removed pursuant to SMC 21A.37 and SMC 25.06, and provide a replanting plan. Please provide an Arborists Report compliant with these code sections.</p>	<p>King County Parks shares your sentiment regarding preserving existing trees and our policy is to avoid impacting significant trees whenever possible. However, there are a number of factors that determine the trail alignment including building the trail within a narrow corridor, steep terrain, and avoiding impacts to environmentally sensitive areas as required by state, local, and federal regulation. Meeting these criteria does require removing some trees to build a trail that is safer and more accessible to people of all ages and abilities. King County's maintenance team only removes trees that are unhealthy or pose a safety risk to the public. The County's contractor only will remove the trees necessary to build the trail. Please refer to the Mitigation Sequency Compliance Narrative in Tab 6 for addition information on the basis of design.</p> <p>The Tree Preservation Plans that were submitted with the permit application (October 2016) were based on the recommendations of a qualified arborist. Both the plans and the arborist report have been updated and are included with this submittal. The arborist report is Tab 11. The Revised Tree Preservation Plans are provided under separate cover.</p>
E	Mainteance	
	<p>1</p> <p>Numerous comments were provided from the public regarding maintenance of the trail and associated facilities. Upon completion of Staff's review of the application materials, it is not clear that maintenance of the trail or associated facilities has been addressed. Provide information regarding the anticipated maintenance schedule for the trail and associated facilities pursuant to SMC 21A.30.220.</p>	<p>On past segments, King County has provided the City of Sammamish with an update to its project-specific Vegetation Management Plan. This plan identifies practices, policies, and procedures for addressing hazard trees, maintaining vegetation at intersections within sight distance triangles and along the trail corridor, addressing noxious weeds, and maintaining drainage features (ditches, pipes, culverts). King County is currently redesigning drainage to comply with the most current stormwater regulations. When drainage features are defined at 90-percent design, King County can provide a segment-specific update to the Vegetation Management Plan, including the requested maintenance schedule.</p> <p>Please note that the provisions of SMC 21A.30.220 are applicable to "private ownership."</p>

II. Comments from the Department of Community Development (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
F	Ownership	
1	Numerous comments were provided from the public regarding ownership. Although the County provided sufficient information to the City regarding ownership it would be beneficial if a written narrative that is easy to understand by a layperson and less technical were provided in addition to the information already received. Please provide a narrative regarding the history and current ownership of the Trail ROW as it relates to the real property include in this proposal. Please work with a public relations professional to ensure the narrative, which should tell the story behind the establishment of the rail corridor, the abandonment of the rail use, the rail-banking, the conversion to an interim trail, and the development of the current proposed trail, is understandable by the average community member. This narrative will be very helpful in clarifying the ownership questions that have been raised through public comment.	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.
III. Comments from the Parks & Recreation Department		
Item/Topic	City of Sammamish Comments	King County Responses
A.	Driveways, road transitions, public access points	
1	Engineering review of driveway and road transitions should occur. The trail cross slope in general is being reduced, and this has led to driveway transition issues for some properties on the north segment.	This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately establish compliance with the requirements related to this comment as part of the relevant permit review.
2	Designate appropriate and adequate public access points to avoid public usage of private driveways. It is not currently designated on the plan set where the public access points will be located. Citizens should be able to review and comment on these locations. Adequate signage should also be provided.	The trail is an opportunity to provide public access to the shoreline because it occurs within the shoreline area and it advances the Shoreline Management Act's goal of increasing access to the shoreline. Dating back to the Final EIS, King County has always intended to construct improvements for public access to the trail (and thus the shoreline). In final design and construction of each segment, King County has met this intent where appropriate and safe. It is important to note that beyond the County-owned corridor, the City of Sammamish has jurisdiction and can make improvements to city facilities that impede or expand access to the shoreline. While King County can provide access from the trail to the Parkway, it is the City's responsibility to make commensurate improvements to allow the public to continue along and across the Parkway, where necessary. In the South Sammamish Segment B, four access points were identified in the environmental impact statement. The public access at the southern terminus (SE 33rd Street) is being constructed as part of South Sammamish Segment A. The public access at the northern terminus (Inglewood Hill Road) will be constructed as part of a separate parking lot project. A third public access point at Louis Thompson Road will be constructed in conjunction with Segment B. A fourth public access point at SE 8th Street will be constructed in the future, in coordination with City of Sammamish improvements along and across East Lake Sammamish Parkway.
B.	Coordination	
1	The City's adopted Trails, Bikeways, and Paths Plan has several planned non-motorized routes running east-west with connections to the East Lake Sammamish Parkway. These are in the vicinity of SE 24th Street, SE 8th Street and SE 32nd Street. Public access points should be designated with consideration given to these routes to facilitate connection to the ELST.	As described in the response to Comment III.A.2 above, two of King County's planned access points (SE 33rd Street and SE 8th Street) are in the vicinity of City projects noted. As the design progresses to 90 percent, King County will coordinate with the City regarding these access locations. The third location (vicinity of SE 24th Street) occurs where private property bounds the trail on both sides, thus constraining connection opportunities.

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III. Comments from the Parks & Recreation Department (continued)		
Item/Topic	City of Sammamish Comments	King County Responses
C.	Coordination	
1	The City is also beginning work on two plans updating non-motorized planning in the City. An update of the Parks, Recreation and Open Space Plan is currently in process with an estimated completion in March 2018. A Transportation Master Plan is proposed to begin Spring 2017 and is anticipated to take 2 years to reach adoption. Both of these plans will incorporate non-motorized transportation. Additional coordination may be possible, depending upon trail schedule with these City plans.	Comment noted. King County will coordinate with the City regarding these plans as a source of potential future access improvement projects.
D.	Visual screening	
1	Where vegetation removal is unavoidable, it is recommended that replanting be provided where possible to reduce visual impacts for neighboring residences.	Not a shoreline comment: This comment is not relevant to the City's review of the shoreline substantial development permit application as it addresses matters outside the scope of the Shoreline Management Act and the City of Sammamish Shoreline Master Program. The County will separately respond to public comments received as part of the SSDP review process that are outside the scope of this permit application in the summer or fall of 2017.
IV. Comments from the Public Works Department		
	Please see responses provided in Tab 3 .	
V. Comments from Eastside Fire and Rescue		
	Please see responses provided in Tab 4 .	
VI. Comments from Sammamish Plateau Water		
	Please see responses provided in Tab 5 .	