

February 16, 2025

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Subject: LU 2024-025 PP PU CA

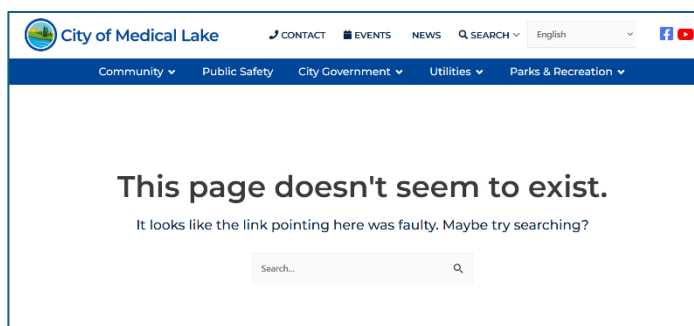
To Whom it May Concern:

In accordance with the procedures outlined in the Medical Lake Municipal Code (MLMC) 16.10.420, the following comments are being submitted with regard to the City of Medical Lake's February 7, 2025 letter issuing a Mitigated Determination of Non-Significance (MDNS). The MDNS (LU 2024-025 PP PU CA) was issued for a proposed 102-lot subdivision for single-family residences located on Spokane County Parcel No. 14192.0002. The MDNS indicates the 38-acre parcel on which the proposed 102-lot subdivision located contains five delineated wetlands.

The opportunity to provide the following comments is much appreciated.

1. The proposal on which the MDNS is being issued is unclear. Please post the SEPA application, wetland delineation report, shoreline critical area ordinance materials and any other documentation required for an MDNS to be issued. The SEPA application does not appear to be publicly available, however the website referenced may just have an incorrect link as shown below.

Determination: The City of Medical Lake has determined that this proposal will not have a probable significant adverse impact on the environment. Pursuant to WAC 197-11-350(3), the proposal has been clarified, changed, and conditioned to include necessary mitigation measures to avoid, minimize or compensate for probable significant impacts. An environmental impact statement (EIS) is not required under RCW 43.21C.030. The necessary mitigation measures are listed below, the Environmental Checklist is attached, and **additional information is available at medical-lake.org/city-government/planning-zoning-department**.



2. The MDNS indicates the proposal is located in an area with five delineated wetlands. Assuming the applicant has the Washington Department of Ecology's minimum credentials for wetland assessment (i.e. five-day wetland delineation class, revised Washington State wetland rating system (2014) class, and required education levels) please provide the wetland delineation/assessment report completed for this proposal. If not, please provide the justification for why a wetland delineation was not required. The concern being there are more than five wetlands located on this parcel.

3. The SEPA determination and identified mitigation issued for this proposal appears inadequate given the location and scale of this development, as identified for each of the SEPA components below.
 - **Air**
Has this proposal been evaluated for long-term ambient air impacts? Removal of wetlands will reduce the areas' ability to produce oxygen and regulate air temperatures. Past wetland mitigation projects have been very limited, this includes five large wetlands and may have significant impact to our communities air.
 - **Water**
The location of the sub-division appears to be within 300-feet of Medical Lake. Though this is hard to assess without a site plan. The surface water, groundwater and stormwater in this area are all hydrogeological connected to the lake which likely supports West Plains groundwater and the communities drinking water. Were impacts to the lake and regional hydrogeology assessed?

What type of construction techniques will be used? There have been other locations where blasting basaltic rocks has reduced groundwater levels impacting neighbors drinking water and burdening them with the substantial cost of drilling deeper wells. This close to Medical Lake, there is a good chance that this development could impact the lake levels by reducing recharge from wetlands and reducing the groundwater levels that recharge the lake.
 - **Plants**
Did the applicant's proposal and the MDNS evaluate impacts from the removal of 38-acres of wetland species? Plants are an essential resource to this arid region which receive approximately 16-inches of precipitation per year. Removal will likely result in decreased capacity to produce oxygen, manage and retain rain and stormwater, etc.
 - **Animals**
Building on wetlands removes habitat for local aquatic and wildlife species. Additionally, bird migration may be impacted. Has this been assessed in the wetland report? Bald Eagles are a protected species that use surface waters in the Medical Lake area.
 - **Land and Shoreline Use**
See comments above (Water) regarding the sites close proximity to the lake.
 - **Light and Glare**
Has there been an assessment of how light pollution might impact the natural and aquatic ecosystems in this region which has seen significant bird migration including Bald Eagles and American White Pelicans, along with other important avian species.
 - **Historic and Cultural Preservation**

Has there been or will there be an assessment of any historical or cultural resource present in the proposed area of development.

- **Transportation**

Has there been an assessment of having over 200 additional cars entering Salnave Rd, in an area that has many pedestrians on the walking trail and in an area that it is common to see drivers speeding?

- **Public Services**

Has there been an assessment of the impact on public safety (police and fire district 3). Additionally, the largest concern is that Medical Lake School District is at capacity (aside from Michael Anderson Elementary). This large of a development will have a huge impact and reduce the quality of schooling for the children of Medical Lake unless addressed by this development.

- **Utilities**

Sewer – Accommodating sewer for a 102-lot subdivision may not be reasonable given the existing capacity limitations of the aged infrastructure as noted in the MDNS. Construction permit should require covering the cost of installing the new sewer line through the City, as opposed to along the shoreline of Medical Lake. As it is now, the age and location of the sewer leading to the Lake-Lift Station is already an environmental concern.

Water - What quantity of water would be needed to service a 102-lot sub-division and what are the impacts to the local municipal water supply. Or should a well be proposed, what are the impacts to the local groundwater and lake levels.

4. Please outline the next steps associated with the development of this subdivision per local, state and federal regulations for construction in a wetland area.

I greatly value the due process the City of Medical Lake Planning Department is completing and understand the time impacts associated with addressing these comments. Please know your expertise is greatly appreciated.

Thank you for your time, I greatly appreciate all your help.

Chad Pritchard
Resident of City of Medical Lake