

From: [Craig Riley](#)
To: [Lori Barlow](#)
Subject: Painted Hills Planned Residential Development Project Re-Submittal; Flood Zone Management - Fill
Date: Friday, November 16, 2018 4:41:39 PM

Ms. Barlow:

I would like to provide you with a few comments regarding this proposal to manage flood plain issues for the proposed Painted Hill PRD by using fill material for the site. Since the project is so complex and the response time is limited, I will limit my comments and concerns to two basic areas:

- Environmental impacts of the fill material: The impact of moving 400,000+ cubic yards of topsoil at the site to bring in 330,000+ cubic yards of imported fill material and then replacing and re-contouring the 400,000+ topsoil will be tremendous and needs to receive detailed consideration in the formal EIS; specifically the EIS should consider in depth:
 - Air quality and traffic impacts of the 25,000 to 30,000 loads of fill material to be delivered to the site
 - Site restoration requirements for the site(s) that will be the source of this fill material
 - Noise pollution impacts to the surrounding neighborhoods resulting from the manipulation of around 1.1 million+ CY of fill material
 - Air quality impacts from blowing dust from handling 1.1 million+ CY of fill material
 - Water quantity requirements for dust control and compaction of 700,000+ CY of material
- Flood zone impacts due to filling the site:
 - Provide flood zone delineation, flood velocity estimates and damage due to flood inundation and scouring on parcels neighboring the PRD site in the event the proposed facilities are not large enough or fail and flood water are diverted around the fill materials on to adjoining properties
 - Provide detailed water quality impacts due to dissolved heavy metals and organic chemical, particularly the BTEX compounds associated with fuels that will be discharged to the Spokane Valley-Rathdrum Prairie Aquifer in what in the past was designated as a particularly sensitive location
 - Provide a detailed assessment of the water quality impacts to all public water system sources downstream of the injection/infiltration site along with proposals for public water systems to assure compliance with regulated and unregulated compounds under the Safe Drinking Water Act
 - Consider applying water quality requirements from WAC 173-200 – Groundwater Quality Standards to the water discharged from the injection system in lieu of relying on bioswale treatment to produce acceptable water quality; please recall that the Flood Control Narrative dated 8/20/18 notes that most floods in this watershed occur during winter when the bioswale grasses are dormant and unable to provide even the minimum chemical removals provided by viable ground cover and grasses and also states that the water is to be “disposed” of in the gravel gallery; disposal implies the

proponent considers this wastewater and therefore should be required to comply with state ground water quality requirements

- Consider requiring the twin 48” concrete pipe transmission pipes along Madison Road to include manholes at 300-400 foot intervals to allow maintenance and cleaning to assure the pipes to not silt in during “normal” flood years
- Consider requiring to the proponent to demonstrate the viability of the proposed gallery system under winter conditions; typical winter conditions could like include scenarios where early rain and snow events drain to the gravel gallery and the residual water freezes in the gravel pores and then a major flood event occurs when a portion or allow the gallery is unavailable to ‘dispose’ of the water.

I appreciate your consideration of these comments.

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