

City of Sumas Mayor/Council and Planning Commission
Sumas City Hall
433 Cherry St.
P.O. Box 9
Sumas, WA 98295

October 30, 2024

Re: Notice of Application, Public Hearing and Probable SEPA Determination of Nonsignificance
Whatcom County Assessor's Parcel numbers: 400403 572521 and 400403 561531
Comment Period October 16 through October 31, 2024.

Esteemed Mayor and Council members,

This letter is in regard to a letter that I received from the City of Sumas about the public hearing and probable SEPA Determination of Nonsignificance – Comment Period for written submissions. These comments are in regard to the Proposal sent in regards to Subdivision of two properties approximately 2.85 acres into 18 residential lots – including a street right of way with and associated roadway improvements below City standards. Including a request for approval of a conditional use permit to allow for the construction of six pairs of attached single family homes, creating a total of 12 units.

As stated in the letter, comments about the environmental impact of the proposal should be submitted in the comment period as this may be the only opportunity to comment on the environmental impacts of the proposal. The letter was received during a time while I was on vacation and could not provide a comment at the October 21st Planning Commission meeting and I will be on vacation on November 12th when the hearing will be held. As such this letter serves as submitted written testimony.

I am a resident of Sumas for many years (20+) and live at 1245 Sumas Ave – within 300' of the property with the proposed change. I have seen the property and area around the proposed property evolve over the years. I have concerns regarding the environmental impact of the development.

One of the main concerns that I have with this development is the displacement of water. This property is low and holds water. When the highway was rerouted and the section of Sumas Avenue around this property was redone – the proposed development area is lower than all the land around it. It is like a bowl that holds water – as could be seen during this last rainfall. Though the grass is currently long – there are large sections with standing water. As this land area fills up it heads North and eventually flows across Noble Street and on to my property. My concern is that as the property is developed the land will be raised and displace the water further pushing water towards my property. In addition to the land being raised the footprint of the houses will also displace the water. As is with any development – there will be a large amount of non-pervious surfaces that will shed water rather than absorb water. In 2019 we also have pictures of some of the property being filled in which made the problem worse for us. We would very much like to make sure that the properties can contain their water with no runoff on to other properties. All of the flooding that we have seen (besides the big flood of 2021) was from rain accumulation not being able to be absorbed in the open field.

I am unsure if a detention pond added to this property could mitigate this concern, but I would like to make sure that the development can contain and hold its own rain water.

It was noted on other rain events and especially during the flooding that there was rain that was pooling and not draining at the corner of Sumas Avenue and Front Street. The Storm water drain would back up and not be sufficient in size to drain the water. In turn the excess water would pool – flooding the area and flowing across Front Street. I am concerned that the existing City infrastructure will not be able to handle the storm water from the new development and any street or right of way adjustments. I would like it if this could be reviewed and upsized if needed to contain additional water that will be in the system.

A new development in this area – if it would be raised sufficiently above the flood area – would also displace any flood water. This would intern – inundate many houses along Sumas Avenue with additional flood waters – whereby homes that were not affected by the last flood may be affected by future floods.

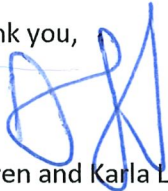
During the latest large flood event this whole property was underwater by 1' – 2'. Presumably if homes were built in this area they would be high enough to be out of the flood water area. This would mean that this area would need to be built up to fill in this low spot, be brought up so that it did not flood, or need flood venting in which the water would need to flow through. Being an adjacent property, we are very concerned about where any potential puddling water or flood water would go and how a development in this location would affect water containment and flow.

I do not think that it would be wise to proceed with this development without ensuring that there is a plan for the mitigation of storm water and a review of the existing storm discharge system.

Please feel free to contact me or let me know if you would like me to speak with you.

We are concerned with what may result if some factors aren't included in this development to mitigate our concerns.

Thank you,

A handwritten signature in blue ink, appearing to be 'DK' or similar initials, written over a horizontal line.

Darren and Karla Leyenhorst
1245 Sumas Ave.
Sumas WA