



TUALATIN RIVERKEEPERS®

11675 SW Hazelbrook Road • Tualatin, Oregon 97062

phone 503-218-2580 • fax 503-218-2583

www.tualatinriverkeepers.org

January 20, 2016

Beaverton Planning Commission
Council Chambers
12725 SW Millikan Way
Beaverton, OR 97076

RE: SOUTH COOPER MOUNTAIN HEIGHTS PUD – CU2015-0006, DR2015-0071, LD2015-0013, TP2015-0008, ZMA2015-0006

Dear Chair Doukas and Planning Commissioners,

Tualatin Riverkeepers offers the following concerns about the South Cooper Mountain Height Planned Unit Development.

The South Cooper Mountain Plan recognized the significant challenges of managing stormwater runoff caused by slopes and shallow slow-draining soils.

Stormwater

Stormwater management should be tailored to the unique soils and natural resources of South Cooper Mountain. Opportunities for infiltration of stormwater are limited due to slopes and soils, making the location, design, and sizing of detention facilities – in coordination with natural resource protection – especially important. Stormwater management is a key concern of area residents.

- South Cooper Mountain Concept Plan

Clear-cutting on approximately half of this site (~50 acres) in has significantly increased runoff of this site. Further development, with the addition of impervious surfaces and storm drains could significantly exacerbate downstream impacts.

The proposed conditions in the staff report are lacking in details of how the applicant will manage stormwater runoff from this development. Considering the difficult conditions (shallow slow-draining soils, slopes and recent deforestation, a thorough review of the stormwater plan by the planning commission is justifiable before approving this PUD. The proposed removal of 75 community trees does not include details of a mitigation plan that would replace the stormwater benefits of these trees.

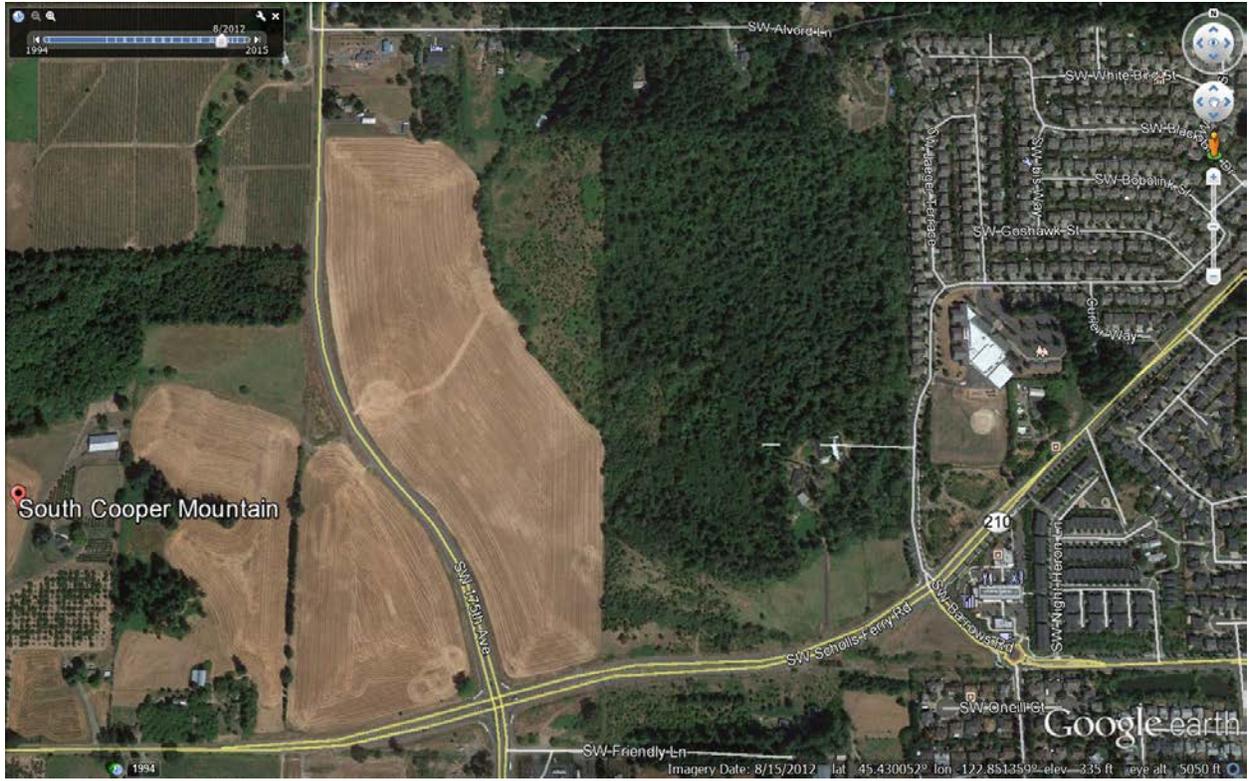


Figure 1 - Aerial photo August 15, 2012

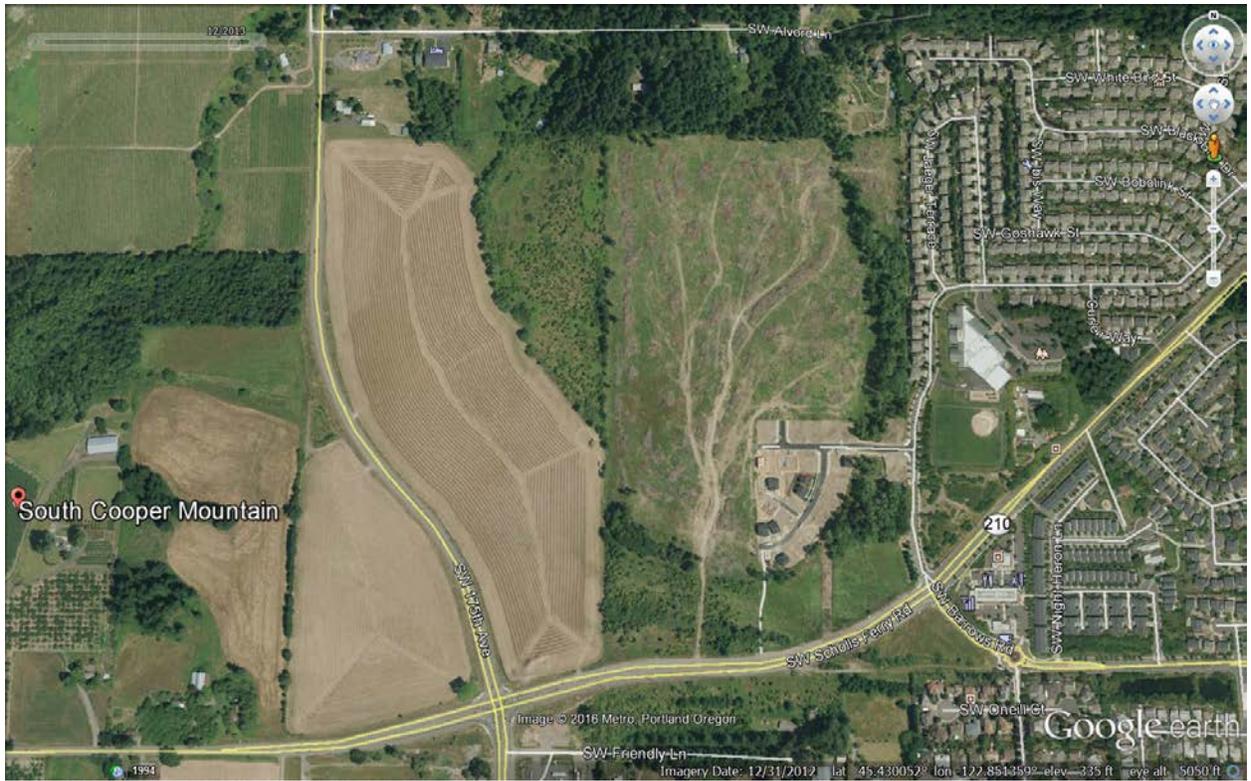


Figure 2 - Aerial Photo December 31, 2012 showing loss of tree canopy that will cause significantly more stormwater runoff.

The South Cooper Mountain prospectus promised onsite stormwater management with “zero effective impervious area” for developed parcels.

Site Treatment: Best Management Practices (BMPs) will be applied at the site level to reduce pollutant transport incorporating recently adopted Low Impact Development Approaches (LIDA) such as rain gardens, green roofs, thermal shading vegetation on buildings and site, on-site porous paving, native plantings instead of lawns, etc. LIDA 's will be sized and designed per CWS Design and Construction Standards and create, in essence, a zero effective impervious area at discharge.

- ***Cooper Mountain Prospectus***

Details on how this elimination of site runoff will be achieved should be considered in your deliberation of this application. DEQ states in the new Clean Water Services permit that for post-construction site runoff, permittees must,

- 1) Incorporate site-specific management practices to mimic natural surface or predevelopment hydrologic functions as much as practicable. The site specific management practices should optimize on-site retention based on the site conditions;
- 2) Reduce site specific post-development stormwater runoff volume, duration and rates of discharges to the municipal separate storm sewer system (MS4) to minimize hydrological and water quality impacts from impervious surfaces;

With the very limited potential for stormwater infiltration on South Cooper Mountain, other stormwater retention strategies, including but not limited to green roofs, urban forestry, rainwater harvesting, aquifer storage and recovery should be explicitly evaluated in this application.

Thank you for your consideration of these comments.

Sincerely,



Brian Wegener
Tualatin Riverkeeper