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## STCA Phase 1 - Stormwater standards

13 messages

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**Miki Mullor** <miki@sammamish.news>

Fri, Nov 13, 2020 at 10:13 PM

To: Jeff Elekes <JElekes@sammamish.us>

Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <drudat@sammamish.us>, Kent Treen <ktreen@sammamish.us>

Good morning Mr. Elekes

I'm working on a story related to the now denied STCA Phase 1 application.

The application, although denied, does have a portion of its stormwater requirement approved by staff.

Staff, in criticism of Council member Kent Treen, has stated publicly that the old 2010 "100% volume retention standard" still applies in the Town Center.

Reading STCA's stormwater application (Exhibit 35.x in the denial notice), lists the following performance standards they were required to adhere to:

### **4.3 Performance Standards**

This project is subject to Level 3 Flow Control requirements and Sensitive Lake Water Quality treatment requirements.

#### Level 3 Flow Control

This standard requires that the developed condition discharge durations will meet Level 2 Flow Control Requirements (match the predeveloped condition discharge durations from 50% of the 2-year peak flow up to the 50-year peak flow. In addition, the developed 2-year and 10-year peak discharge rates will not exceed the pre-developed 2-year and 10-year peak, respectively) and match the developed 100-year peak discharge rate to the predeveloped 100-year peak discharge rate.

#### Sensitive Lake Water Quality Treatment

The treatment goal of Sensitive Lake Water Quality Treatment is 50% annual average total phosphorus (TP) removal assuming typical pollutant concentrations in urban runoff.

My questions to you:

1. Is "Level 3 Flow Control" the same as the 2010 water volume onsite retention standard (the one Council member Treen attempted to reenact) ?
2. If not, then where in STCA's application is the water volume standard referenced?
3. Does staff still believe that increasing the volume of water draining into creeks can cause problems ? If not, why has the city changed its mind ?

These questions are for the record.

Thank you

Miki Mullor

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**Jeff Elekes** <JElekes@sammamish.us>

Fri, Nov 13, 2020 at 11:30 PM

To: Miki Mullor <miki@sammamish.news>

Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, Kent Treen <KTreen@sammamish.us>

Mr. Mullor,

Was is the time for your story? I will need some staff assist to help me develop a response to your questions.

Best Regards,

*Jeff Elekes, P.E.*

*Public Works Director, PW Dept.*

*City of Sammamish | 801 228<sup>th</sup> Avenue SE | Sammamish WA 98075*

*☎ : 425-295-0520 | F: 425-295-0600 | [JElekes@sammamish.us](mailto:JElekes@sammamish.us)*



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**From:** Miki Mullor <[miki@sammamish.news](mailto:miki@sammamish.news)>  
**Sent:** Friday, November 13, 2020 1:14 PM  
**To:** Jeff Elekes <[JElekes@sammamish.us](mailto:JElekes@sammamish.us)>  
**Cc:** Celia Wu <[CWu@sammamish.us](mailto:CWu@sammamish.us)>; Dave Rudat <[DRudat@sammamish.us](mailto:DRudat@sammamish.us)>; Kent Treen <[KTreen@sammamish.us](mailto:KTreen@sammamish.us)>  
**Subject:** STCA Phase 1 - Stormwater standards

**[CAUTION - EXTERNAL EMAIL]**

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**Miki Mullor** <miki@sammamish.news>

Fri, Nov 13, 2020 at 11:37 PM

To: Jeff Elekes <JElekes@sammamish.us>

Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, Kent Treen <KTreen@sammamish.us>

Likely won't be published before Wednesday - so ideally I'd like to have comments before noon on Tuesday.

The context of the story will be how dismantling the 2010 standard enabled STCA to get approval for its stormwater practices without LID to protect the streams.

Staff's resistance to re-enact the old volume standard will be highlighted in that context - unless of course you can show me and my readers (several thousands of them) - how the creeks will be protected from the excess volume of water the 90% impervious surface in the TC generates (a claim your employees made on Facebook).

Thank you

Miki

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**Jeff Elekes** <JElekes@sammamish.us>

Tue, Nov 17, 2020 at 9:40 PM

To: Miki Mullor <miki@sammamish.news>

Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>

Mikki,

See attached.

Best Regards,

*Jeff Elekes, P.E.*

*Public Works Director, PW Dept.*

*City of Sammamish | 801 228<sup>th</sup> Avenue SE | Sammamish WA 98075*

*☎: 425-295-0520 | F: 425-295-0600 | [JElekes@sammamish.us](mailto:JElekes@sammamish.us)*



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**From:** Miki Mullor <miki@sammamish.news>  
**Sent:** Friday, November 13, 2020 1:14 PM  
**To:** Jeff Elekes <JElekes@sammamish.us>  
**Cc:** Celia Wu <CWu@sammamish.us>; Dave Rudat <DRudat@sammamish.us>; Kent Treen <KTreen@sammamish.us>  
**Subject:** STCA Phase 1 - Stormwater standards

**[CAUTION - EXTERNAL EMAIL]**

Good morning Mr. Elekes

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 **Response to Questions date 11132020.pdf**  
347K

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**Miki Mullor** <miki@sammamish.news>  
To: Jeff Elekes <JElekes@sammamish.us>  
Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>

Tue, Nov 17, 2020 at 11:33 PM

Hello Jeff-

Thank you for the comments. I do have a few follow up questions:

1. I've seen two TIRs for the townhomes / single family homes sections of the Phase 1 (Brownstone East and Brownstone West).

Was there also a TIR for the apartments and commercial development ? if yes, could you please point it out (I couldn't find it). If not, what's the reason ?

2. BMPs - going through the two TIRs, it seems like STCA is claiming infeasibility on all BMPs except for preambles surfaces for driveways. Yet, the application was approved.

(a) Does the city know what increase in volume of water the creeks will see compared to pre-development conditions?

(b) Is it fair to say that less than 100% of pre-development water volume will remain on site?

(c) the BMP standard seems like a "best effort" standard (prescribing action). Level 3 flow control seems like a performance standard (prescribing results). The 2010 volume standard seems also like a performance standard. If performance standards are acceptable (i.e. level 3), what's the harm of re-enacting the 2010 volume as an additional layer of defense for the creeks?

(d) Would STCA's part of the application that complied with the current standards also pass the old 2010 volume standard?

3. Is this statement accurate?



Thank you,

I'll push my deadline to Monday to receive your responses.

Miki

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**Miki Mullor** <miki@sammamish.news>

Tue, Nov 17, 2020 at 11:34 PM

To: Kent Treen <ktreen@sammamish.us>

Cc: Dave Rudat <drudat@sammamish.us>, Celia Wu <CWu@sammamish.us>, Jeff Elekes <JElekes@sammamish.us>

Council member Treen,

you were dropped out of this thread. Re-including you

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 **Response to Questions date 11132020.pdf**  
347K

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**Miki Mullor** <miki@sammamish.news>

Tue, Nov 17, 2020 at 11:35 PM

To: Jeff Elekes <JElekes@sammamish.us>, Kent Treen <ktreen@sammamish.us>

Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>

re-adding council member Treen

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**Jeff Elekes** <JElekes@sammamish.us>

Wed, Nov 18, 2020 at 12:04 AM

To: Miki Mullor <miki@sammamish.news>, Kent Treen <KTreen@sammamish.us>, City Council

<citycouncil@sammamish.us>

Cc: Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, David Pyle <dpyle@sammamish.us>, Kellye Hilde <khilde@sammamish.us>

Mr. Mullor,

Most of your new questions appear to revolve around the development application of SCTA in the Town Center. Respectfully, I will ask that you direct all development application related questions to Community Development Director - Mr. Pyle's group, in the Department of Community Development. I not am sure what their workload is at the moment, and thus I'm not able to commit, one way or another, regarding your desired deadline.

Regarding new question #3, I offer the following:

The City stormwater regulations of 2010 and 2013 have been replaced with the adoption of the 2016 King County Surface Water Design Manual and the Sammamish Addendums. The current City of Sammamish regulations for Level 3 requires that a development apply the historic site condition and matches the historic durations of the for 50% of 2-yr through 50-year peaks AND matches historic 2 – and 10-yr peaks, AND match existing site conditions 100-year peaks. For flow control BMPs (LID) the storm event range is 8% of the 2-year storm up to 50% of the 2-year storm.

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**Miki Mullor** <miki@sammamish.news>

Wed, Nov 18, 2020 at 12:29 AM

To: Jeff Elekes <JElekes@sammamish.us>

Cc: Kent Treen <KTreen@sammamish.us>, City Council <citycouncil@sammamish.us>, Celia Wu <CWu@sammamish.us>,

Dave Rudat <DRudat@sammamish.us>, David Pyle <dpyle@sammamish.us>, Kellye Hilde <khilde@sammamish.us>

Mr. Elekes -

Thank you for the note.

The environment is top of mind of the voters in Sammamish - clarity will be welcomed by the residents, especially given that staff opened the door by making public statements on the issue and confusing the public by contradicting what seemed like a clear public record:

So let me simplify the question, maybe that will help:

1. Does the current stormwater regulations in effect protect the creeks near the Town Center at the same level the 2010 regulation did?

2. I will posit that this question is unrelated to the Town Center:

"(c) the BMP standard seems like an "best effort" standard (prescribing action). Level 3 flow control seems like a

performance standard (prescribing results). The 2010 volume standard seems also like a performance standard. if performance standards are acceptable (i.e. level 3), what's the harm of re-enacting the 2010 volume as an additional layer of defense for the creeks?"

Mr. Pyle -

1. I've seen two TIRs for the townhomes / single family homes sections of the Phase 1 (Brownstone East and Brownstone West).

Was there also a TIR for the apartments and commercial development ? if yes, could you please point it out (I couldn't find it). If not, what's the reason ?

2. Does the city know what increase in volume of water the creeks will see compared to pre-development conditions in Town Center Phase 1?

3. Is it fair to say that less than 100% of pre-development water volume will remain on site?

Thank you

Miki

[Quoted text hidden]

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**Jeff Elekes** <JElekes@sammamish.us> Wed, Nov 18, 2020 at 12:55 AM  
To: Miki Mullor <miki@sammamish.news>  
Cc: Kent Treen <KTreen@sammamish.us>, City Council <citycouncil@sammamish.us>, Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, David Pyle <dpyle@sammamish.us>, Kellye Hilde <khilde@sammamish.us>, Stephen Noeske <SNoeske@sammamish.us>

Mr. Mullor,

I spoken with Mr. Pyle. I will need to have an internal staff meeting with our development review team, review your new questions, and then develop a response.

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**Miki Mullor** <miki@mullor.org> Wed, Nov 18, 2020 at 1:11 AM  
To: Jeff Elekes <JElekes@sammamish.us>  
Cc: Miki Mullor <miki@sammamish.news>, Kent Treen <KTreen@sammamish.us>, City Council <citycouncil@sammamish.us>, Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, David Pyle <dpyle@sammamish.us>, Kellye Hilde <khilde@sammamish.us>, Stephen Noeske <SNoeske@sammamish.us>

Mr. Elekes

Never mind. I don't want the city to waste resources on developing a response. I assumed that the city already have answers to such fundamental issues.

Let me just then ask you this one question:

1. Does the current stormwater regulations in effect protect the creeks near the Town Center at the same level the 2010 regulation did?

Thank you for your time

Miki Mullor

On Nov 18, 2020, at 12:55 AM, Jeff Elekes <[JElekes@sammamish.us](mailto:JElekes@sammamish.us)> wrote:

Mr. Mullor,

I spoken with Mr. Pyle. I will need to have an internal staff meeting with our development review team, review your new questions, and then develop a response.

Best Regards,

*Jeff Elekes, P.E.*

*Public Works Director, PW Dept.*

*City of Sammamish | 801 228<sup>th</sup> Avenue SE | Sammamish WA 98075*

*☎: 425-295-0520 | F: 425-295-0600 | [JElekes@sammamish.us](mailto:JElekes@sammamish.us)*

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**From:** Miki Mullor <miki@sammamish.news>  
**Sent:** Tuesday, November 17, 2020 2:35 PM  
**To:** Jeff Elekes <JElekes@sammamish.us>; Kent Treen <KTreen@sammamish.us>  
**Cc:** Celia Wu <CWu@sammamish.us>; Dave Rudat <DRudat@sammamish.us>  
**Subject:** Re: STCA Phase 1 - Stormwater standards

**[CAUTION - EXTERNAL EMAIL]**

re-adding council member Treen

On Tue, Nov 17, 2020 at 11:33 PM Miki Mullor <miki@sammamish.news> wrote:

Hello Jeff-

Thank you for the comments. I do have a few follow up questions:

1. I've seen two TIRs for the townhomes / single family homes sections of the Phase 1 (Brownstone East and Brownstone West).

Was there also a TIR for the apartments and commercial development ? if yes, could you please point it out (I couldn't find it). If not, what's the reason ?

2. BMPs - going through the two TIRs, it seems like STCA is claiming infeasibility on all BMPs except for preamble surfaces for driveways. Yet, the application was approved.

(a) Does the city know what increase in volume of water the creeks will see compared to pre-development conditions?

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(d) Would STCA's part of the application that complied with the current standards also pass the old 2010 volume standard?

3. Is this statement accurate?

<image002.jpg>

Thank you,

I'll push my deadline to Monday to receive your responses.

Miki

On Tue, Nov 17, 2020 at 9:40 PM Jeff Elekes <[JElekes@sammamish.us](mailto:JElekes@sammamish.us)> wrote:

Mikki,

See attached.

Best Regards,

*Jeff Elekes, P.E.*

*Public Works Director, PW Dept.*

*City of Sammamish | 801 228<sup>th</sup> Avenue SE | Sammamish WA 98075*

☎: 425-295-0520 | F: 425-295-0600 | [JElekes@sammamish.us](mailto:JElekes@sammamish.us)

<image001.jpg>

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**From:** Miki Mullor <[miki@sammamish.news](mailto:miki@sammamish.news)>  
**Sent:** Friday, November 13, 2020 1:14 PM  
**To:** Jeff Elekes <[JElekes@sammamish.us](mailto:JElekes@sammamish.us)>  
**Cc:** Celia Wu <[CWu@sammamish.us](mailto:CWu@sammamish.us)>; Dave Rudat <[DRudat@sammamish.us](mailto:DRudat@sammamish.us)>; Kent Treen <[KTreen@sammamish.us](mailto:KTreen@sammamish.us)>  
**Subject:** STCA Phase 1 - Stormwater standards

**[CAUTION - EXTERNAL EMAIL]**

Good morning Mr. Elekes

I'm working on a story related to the now denied STCA Phase 1 application.

The application, although denied, does have a portion of its stormwater requirement approved by staff.

Staff, in criticism of Council member Kent Treen, has stated publicly that the old 2010 "100% volume retention standard" still applies in the Town Center.

Reading STCA's stormwater application (Exhibit 35.x in the denial notice), lists the following performance standards they were required to adhere to:

<image003.png>

My questions to you:

1. Is "Level 3 Flow Control" the same as the 2010 water volume onsite retention standard (the one Council member Treen attempted to reenact) ?

2. If not, then where in STCA's application is the water volume standard referenced?

3. Does staff still believe that increasing the volume of water draining into creeks can cause problems ? If not, why has the city changed its mind ?

These questions are for the record.

Thank you

Miki Mullor

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**Jeff Elekes** <JElekes@sammamish.us>

Wed, Nov 18, 2020 at 7:47 PM

To: Miki Mullor <miki@mullor.org>

Cc: Miki Mullor <miki@sammamish.news>, Kent Treen <KTreen@sammamish.us>, City Council <citycouncil@sammamish.us>, Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, David Pyle <dpyle@sammamish.us>, Kellye Hilde <khilde@sammamish.us>, Stephen Noeske <SNoeske@sammamish.us>

Mr. Mullor,

I plan to have a response to you regarding this question, by the end of the day today.

Best Regards,

*Jeff Elekes, P.E.*

*Public Works Director, PW Dept.*

*City of Sammamish | 801 228<sup>th</sup> Avenue SE | Sammamish WA 98075*

 : 425-295-0520 | *F:* 425-295-0600 | [JElekes@sammamish.us](mailto:JElekes@sammamish.us)



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Jeff Elekes <JElekes@sammamish.us>

Thu, Nov 19, 2020 at 12:22 AM

To: Miki Mullor <miki@mullor.org>

Cc: Miki Mullor <miki@sammamish.news>, Kent Treen <KTreen@sammamish.us>, City Council <citycouncil@sammamish.us>, Celia Wu <CWu@sammamish.us>, Dave Rudat <DRudat@sammamish.us>, David Pyle <dpyle@sammamish.us>, Kellye Hilde <khilde@sammamish.us>, Stephen Noeske <SNoeske@sammamish.us>, Danika Globokar <dglobokar@sammamish.us>

Mr. Mullor,

I appreciate your desire for us to provide a simple answer to what you may view as simple question(s). However, this subject is rather complex, as you have likely come to understand. Our goal in some of these lengthy answers, is to help provide further education on the topic, share current terminology, and assure the public that the City is currently following the requirements mandated by the Environmental Protection Agency (EPA) through the Department of Ecology (DOE) under our National Pollutant Discharge Elimination System (NPDES) permit.

We understand that your most resent question (11/17/2020) follows:

**1. Does the current stormwater regulations in effect protect the creeks near the Town Center at the same level the 2010 regulation did?**

They are similar in that their intent was/is to protect downstream creeks, in part, by using LID BMPs, as well as Flow Control measures, to the maximum extent practically feasible (2010) or maximum extent feasible (2016), both of which were/are a function of specific location/site/soil/infiltration conditions.

The 2016 King County Surface Water Design Manual (4/26/2016), Page 1-82, states, in part, the following:

“Intent: To provide mitigation of hydrologic impacts that are not possible/practical to mitigate with a flow control facility. Such impacts include increases in runoff volumes and flashiness and decreases in groundwater recharge. Increased runoff volume and flashiness leads to higher and more variable stream velocities at low flows and more frequent water level fluctuations in streams and wetlands. This causes wash-out and stranding of aquatic species, algal scour and washout of organic matter, loss of vegetation diversity and habitat quality, and disruption of cues for spawning, egg hatching, and migration. Decreased groundwater recharge reduces water supply for human use and summer base flows in streams, which is critical to water temperature, salmonid use of smaller streams, and the habitat quality of mainstem side channels and wetlands used for spawning, rearing, and flood refuge. Flow control BMPs seek to reduce runoff volumes and flashiness and increase groundwater recharge by reducing imperviousness and making use of the pervious portions of development sites to maximize infiltration and retention of stormwater onsite. Thus, the goal is to apply flow control BMPs to new impervious surfaces, new pervious surfaces, replaced impervious surfaces, and existing impervious surfaces added since January 8, 2001 (effective date of the ESA 4(d) Rule for Puget Sound Chinook salmon) to the maximum extent feasible without causing flooding or erosion impacts.”

I have not seen a specific report, nor have I developed the technical analysis, to determine what the exact difference might be, for a typical project site within the watershed drainage basin, that the Town Center is located and whether or not the downstream creek protect is the same.

In the event that the City Council desires to direct the City Manager to have staff, through consultant support services, and likely additional budget authority, to analyze the technical differences between the 2010 regulations and 2016 regulations, staff would support such an effort.

## **2010**

R2010-430 adopts the interim stormwater standards for Town Center. It points to “Appendix G – Interim Stormwater Development Standards for Sammamish Town Center” to further explain the volume-matching requirement. Part of Appendix G includes this:

- (4) **Modification or Elimination of Requirements.** Compliance with the adopted stormwater standards and specifications, and applicable Low Impact Development improvements shall be required to the maximum extent practically feasible. The City is authorized to approve the modification or elimination of stormwater standards and / or Low Impact Development improvement requirements, standards, and specifications set forth in

Ordinance 2010-293 adopted code that pointed to the interim stormwater standards. Section 21B.85.040(4) contained the following code language. This language is consistent with present-day Core Requirement #9, in that it requires meeting standards to the maximum extent feasible, recognizing that site conditions may render full compliance infeasible.

As noted in Appendix G – Interim Stormwater Development Standards for Sammamish Town Center, the intent was for the interim standards – including volume matching – to be an interim standard until the Department of Ecology technical committee developed definitions for LID and feasibility. Once Ecology had an official position, then the City had the option to adopt it with or without modifications, and the interim standard would no longer be in effect.

## **2016**

In 2016, City Council passed Ordinance O2016-428 which adopted the 2016 King County Surface Water Design Manual, which incorporated the Department of Ecology’s LID definitions and feasibility criteria. This manual, unlike the 2009 and earlier versions, required projects to incorporate flow control BMPs which seek to reduce stormwater runoff volumes from the site. Core Requirement #9 requires projects implement BMPs (LID) to the maximum extent feasible, addressing some of the volume-matching concerns. Thus, with the adoption of the 2016 KCSWDM which incorporated LID and flow control BMPs, the interim stormwater standards had met the criteria to be repealed.

Best Regards,

*Jeff Elekes, P.E.*

*Public Works Director, PW Dept.*

*City of Sammamish | 801 228<sup>th</sup> Avenue SE | Sammamish WA 98075*

 : 425-295-0520 | *F: 425-295-0600 | [JElekes@sammamish.us](mailto:JElekes@sammamish.us)*



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