RILEYGROUP

Exhibit 16

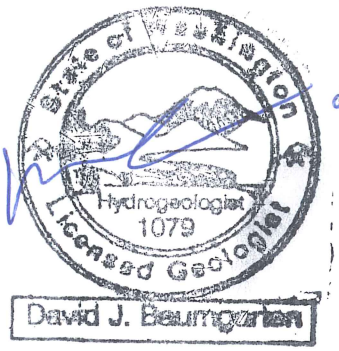
TECHNICAL MEMORANDUM

Date: September 24, 2019

To: Mr. Robert Fitzmaurice
Crestview Village, LLC
15 Lake Bellevue Drive, Suite 102
Bellevue, Washington 98005

From: Kristina Weller, PE/David Baumgarten, LHG
The Riley Group, Inc.

Subject: Review Comments for Crestview Village II
Infiltration Feasibility
RGI Project No: 2014-169B



This memorandum addresses review comments from Perteet Engineering on the "Drainage Report" for the Crestview II site in Mill Creek, Washington "Review Comments for Crestview II, from Brian Caferro, PE, Perteet Engineering, dated August 22, 2019".

Drainage Report

Comment: Page 17: *Ecology still wants to see proof that the infiltration rates are less than 0.30 in/hr via a PIT test, even in till soils. High groundwater table that will not provide required separation can also be used as an infeasibility criteria. High groundwater elevation should be determined by performing groundwater monitoring during the wet season.*

Response

The Riley Group (RGI) completed a geotechnical engineering report (GER) in July 2016 for the Crestview Village II site. Six test pits (TP-1 through TP-6) were completed to access soil and groundwater conditions. Subsurface conditions included Vashon-age lodgment till overlain by varying thicknesses of fill, weathered lodgment till, and silt. The depths at which the till was encountered generally ranged from 2 to 5 feet, with the exception of TP-5 in which the till was encountered at a depth of 8 feet below grade. The soils over lying the till in TP-5 included fill soils with concrete and metal debris as well as wood from existing grade to a depth of approximately 5 feet and a soft organic silt from a depth of 5 feet to 8 feet below grade. Fill soils were also found in TP-3 and TP-6.

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Light groundwater seepage was noted in test pits TP-2 and TP-6, located on the northern portion of the site, at a depth of approximately 7.5 feet, moist to wet soils were noted at approximately 5.5 feet below grade. A well was installed at the TP-6 location, after the groundwater level stabilized the groundwater level in the TP-6 well was approximately 5.2 feet below grade. Groundwater encountered in TP-2 and TP-6 does not appear to represent a regional water table as it was not encountered in the other test pits at the site. It is likley an isolated zone of groundwater in the more permeable lens in the till units.

RGI's geotechnical report also notes the expectation of a seasonal perched groundwater zone to develop on the unweathered till surface in the winter months. This zone is typically called an "interflow zone". The interflow zone typically ranges in thickness from 6 to 18 inches.

The GER also concludes that based on the soils and groundwater levels encountered at the test pit locations infiltration of stormwater does not appear feasible. Due to the fill soils and shallow depth of the lodgment till "a restrictive layer" the required separation distance (typically 5 feet) for conventional stormwater infiltration facilities (infiltration ponds, infiltration trenches, and infiltration galleries) called for in the Stormwater Management Manual for Western Washington (SWMMWW) could not be met.

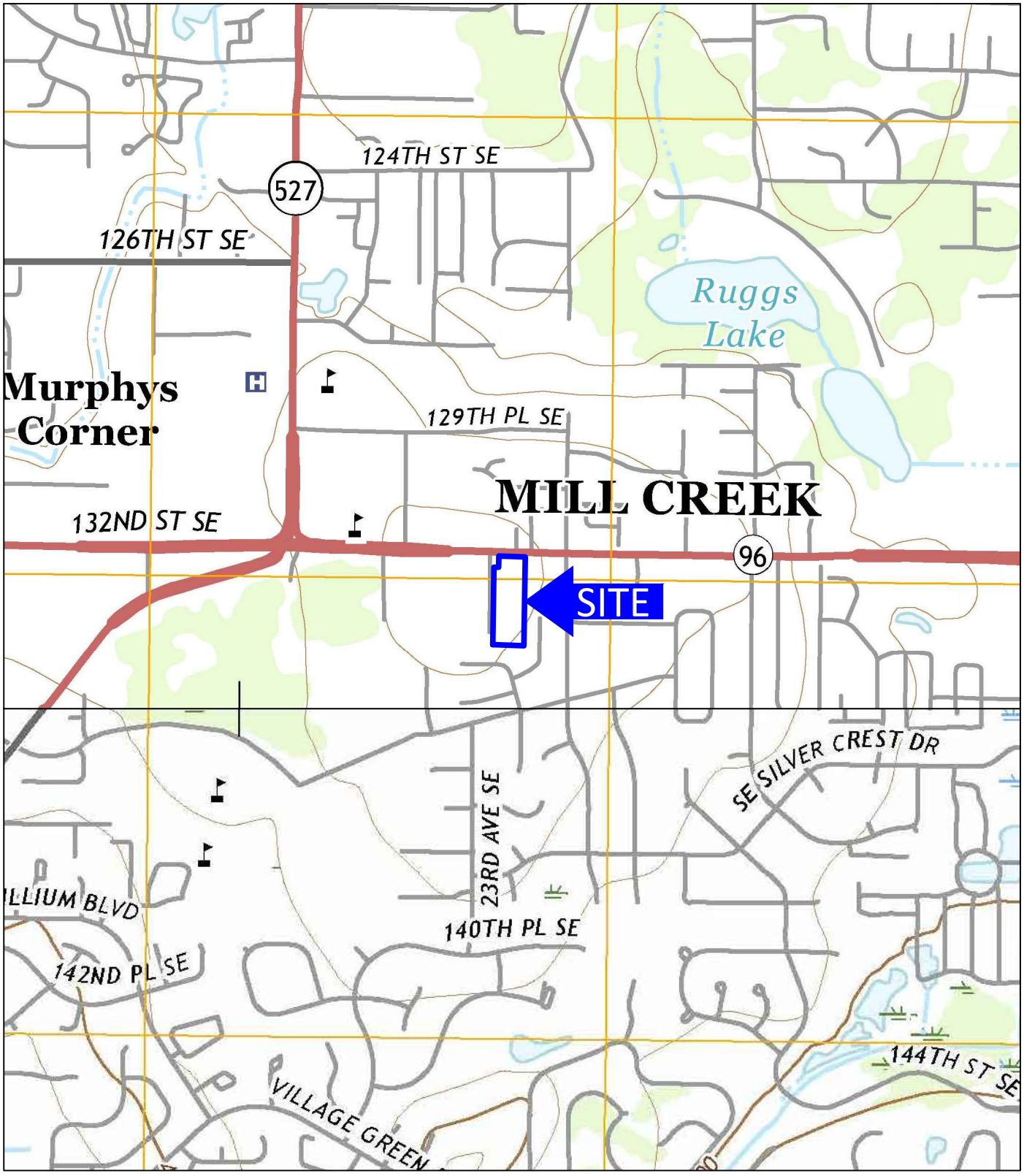
The SWMMWW also provides guidance for Low Impact Development stormwater infiltration elements, specifically bioretention. Bioretentiion cells are shallow depressions with a designed planting soil mix and a variety of plant materials, including trees, shrubs, grasses, and/or other herbaceous plants. The SWMMWW manual presents typical design specifications for bioretention cells which includes 1.5 feet of bioretention soil in the base of the cell with a 3-inch layer of course compost overlying the biorentention soil. The SWMMWW manual also shows a "ponding depth" in the cells which the manual notes "varies", typically the ponding depth is a minimum of 18 inches. The elements of the biorentention cell result in a bioretention cell profile of a little more than 3 feet in depth below grade.

The SWMMWW also lists required "separation distances" between the bottom of the bioretention cell and the seasonal high groundwater table, bedrock, or other impervious layer. Given the proposed site development and impervious areas the separation distance from the bottom of the bioretention cell and high groundwater, bedrock, or impervious layer would be 3-feet.

The lodgment till surface (a restrictive layer/impervious layer) is at depths ranging from 2 to 4 feet below grade in test pits TP-1, TP-2, TP-3, TP-4, and TP-6. Given the bioretention cell profile of at least 3-feet described above the required separation distance of 3 feet between the base of the bioretention cell and high groundwater, bedrock, or an impervious layer would not be achieved. In addition the groundwater level measured in the well at the TP-6 location (5.2 feet below grade) would result in less than three feet of separation from the base of a bioretention cell and that groundwater level was measured in July, when we would expect the groundwater level to be at a seasonal low level.

The lodgment till surface in TP-5 was encountered at approximately 8 feet below grade. However organic silt, overlying the till, was encountered at 5 feet below grade. The silt would typically be considered an impervious layer, resulting in less than 3 feet of separation from the base of a bioretention cell to the impervious layer. Furthermore, fill soils were found in TP-5 from grade to the top of the silt unit. The SWMMWW manual only allows infiltration in fill material if the fill is placed and compacted under the direct supervision of a geotechnical engineer or professional civil engineer with geotechnical expertise, and if the measured infiltration rate is at least 8 inches per hour. The fill soils at the site were an uncontrolled fill which contains concrete and metal debris as well as wood

Based on the soils, and depths to seasonal high groundwater, and presence of uncontrolled fill soils, infiltration of stormwater is not feasible at the Crestview Village II site based on the specifications in the SWMMWW for conventional infiltration facilities (infiltration ponds, infiltration trenches, and infiltration galleries) as well as bioretention cells. We understand a detention vault was installed at the adjacent Crestview I site, which has similar soil and groundwater conditions, to manage stormwater runoff.



USGS, 2014, Everett, Washington
USGS, 2017, Bothell, Washington
7.5-Minute Quadrangle

Approximate Scale: 1"=1000'

0 500 1000 2000

N

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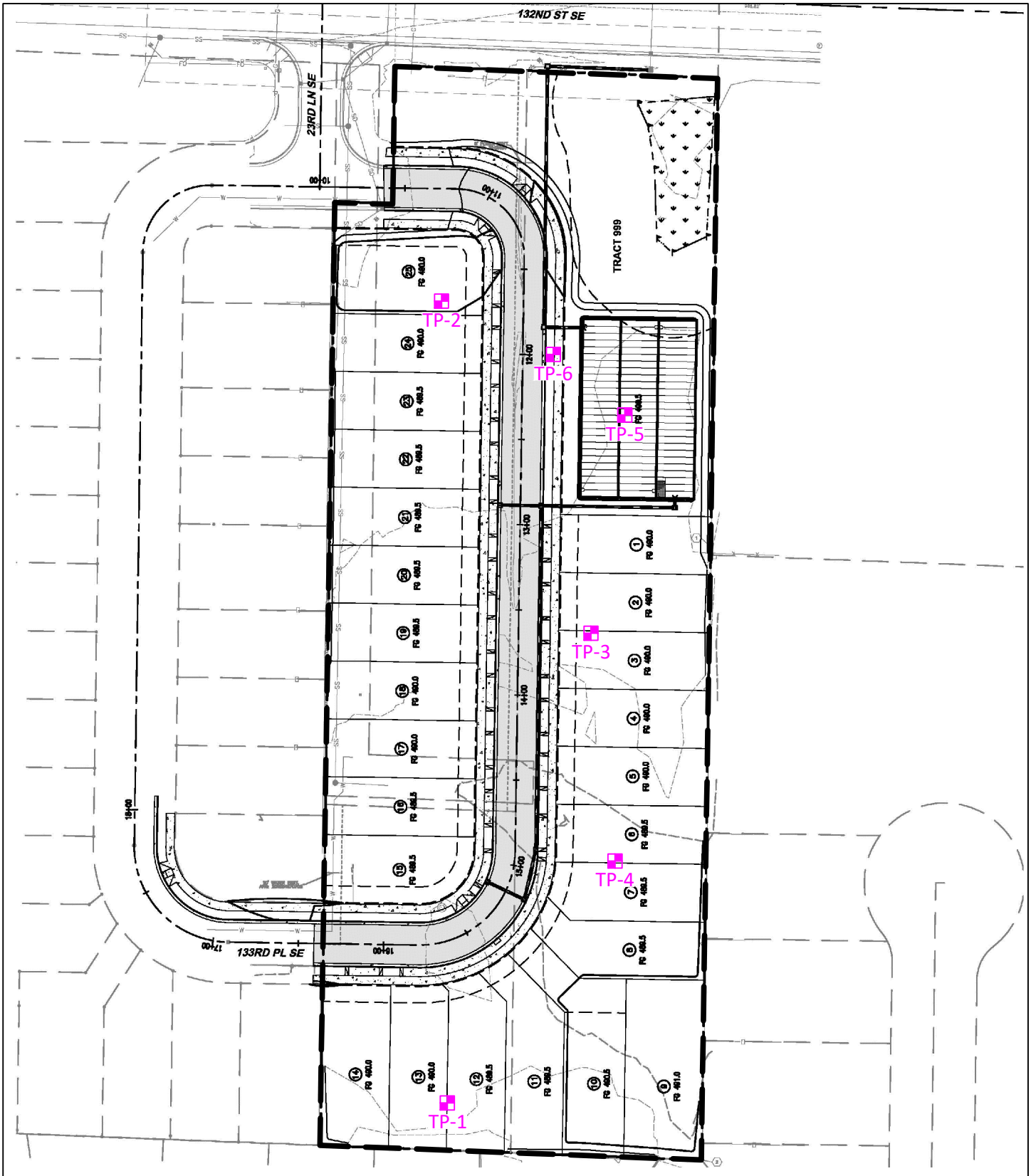
Crestview Village II		Figure 1
RGI Project Number: 2014-169B	Site Vicinity Map	Date Drawn: 07/2019
Address: 2316 & 2318 132nd Street Southeast, Mill Creek, Washington 98012		



= Test pit by RGI, 07/10/19

= Site boundary

Approximate Scale: 1"=80'

0 40 80 160

N

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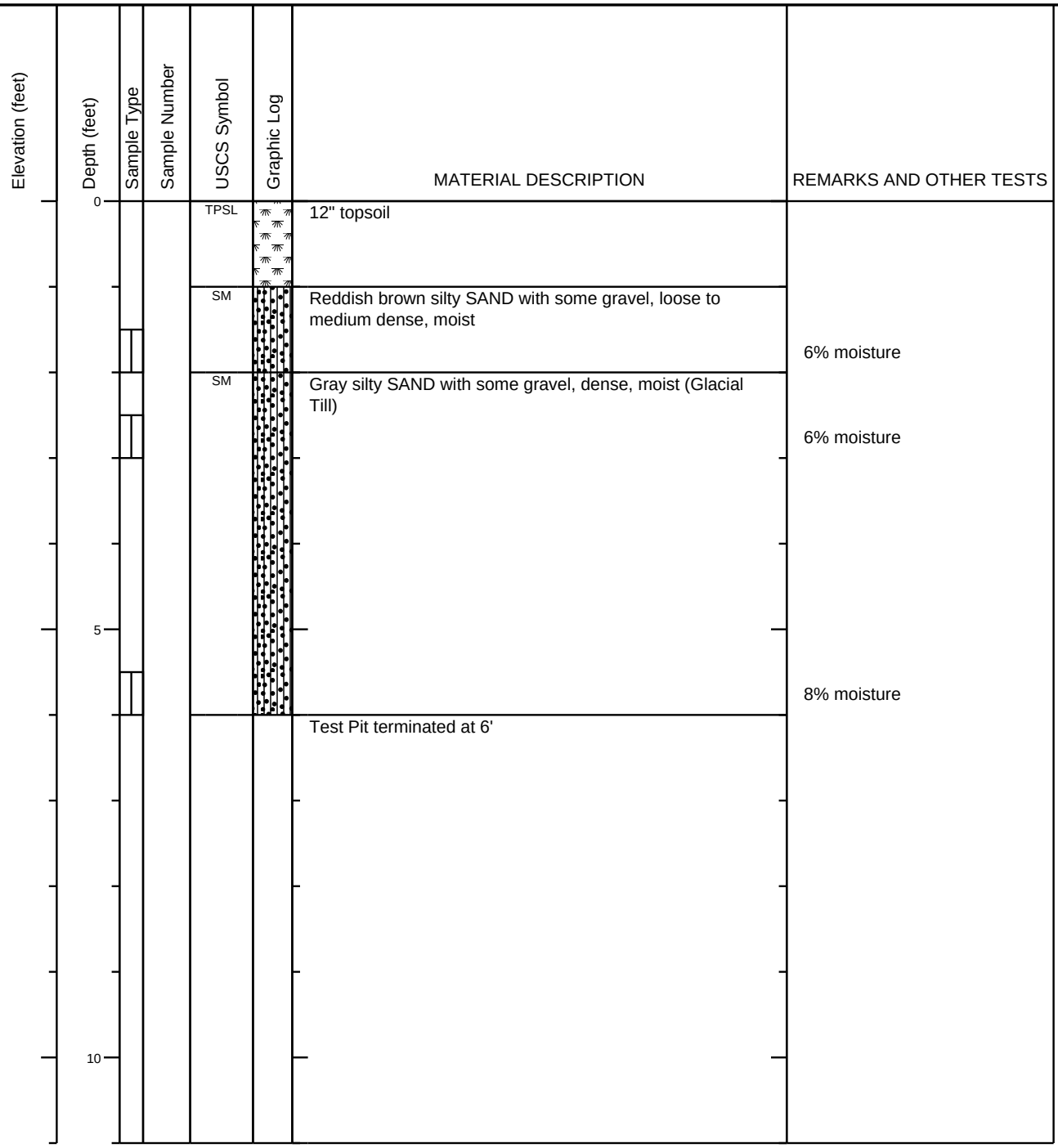
Crestview Village II		Figure 2
RGI Project Number: 2014-169B	Geotechnical Exploration Plan	Date Drawn: 07/2019
Address: 2316 & 2318 132nd Street Southeast, Mill Creek, Washington 98012		

Project Name: **Crestview Village II** Project Number: **2014-169B** Client: **Crestview Village, LLC**	RILEYGROUP Test Pit No.: TP-1 **Sheet 1 of 1**

Date(s) Excavated: **7/10/2019**	Logged By **ELW**	Surface Conditions: **Grass**
Excavation Method: **Test Pit**	Bucket Size: **N/A**	Total Depth of Excavation: **6 feet bgs**
Excavator Type: **Mini Excavator**	Excavating Contractor: **NW Excavating**	Approximate Surface Elevation **N/A**
Groundwater Level: **Not Encountered**	Sampling Method(s) **Grab**	Compaction Method **Bucket**
Test Pit Backfill: **Cuttings**	Location **2316 and 2318 132nd Street Southeast, Mill Creek, Washington**	



Project Name: **Crestview Village II**
Project Number: **2014-169B**
Client: **Crestview Village, LLC**

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Test Pit No.: TP-2

Sheet 1 of 1

Date(s) Excavated: **7/10/2019**	Logged By **ELW**	Surface Conditions: **Grass**
Excavation Method: **Test Pit**	Bucket Size: **N/A**	Total Depth of Excavation: **10 feet bgs**
Excavator Type: **Mini Excavator**	Excavating Contractor: **NW Excavating**	Approximate Surface Elevation **N/A**
Groundwater Level: **Not Encountered**	Sampling Method(s) **Grab**	Compaction Method **Bucket**
Test Pit Backfill: **Cuttings**	Location **2316 and 2318 132nd Street Southeast, Mill Creek, Washington**	

Depth (feet)	USCS Symbol	MATERIAL DESCRIPTION	REMARKS AND OTHER TESTS
0	TPSL	10" topsoil	
	SM	Reddish brown silty SAND with trace gravel, medium dense, moist	29% moisture
	SM	Tan mottled silty SAND with some graverl, medium dense, moist (Weathered Till)	19% moisture
	SM	Gray silty gravelly SAND, dense, moist (Glacial Till)	
			9% moisture, 28% fines
5		Becomes moist to wet	
		Becomes wet	7% moisture
		Light groundwater seepage at 7.5 to 10 feet	
		Light caving	13% moisture
			12% moisture
10		Test Pit terminated at 10'	

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Project Name: **Crestview Village II**
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Test Pit No.: TP-3

Sheet 1 of 1

Date(s) Excavated: **7/10/2019**	Logged By **ELW**	Surface Conditions: **Blackberries**
Excavation Method: **Test Pit**	Bucket Size: **N/A**	Total Depth of Excavation: **7.5 feet bgs**
Excavator Type: **Mini Excavator**	Excavating Contractor: **NW Excavating**	Approximate Surface Elevation **N/A**
Groundwater Level: **Not Encountered**	Sampling Method(s) **Grab**	Compaction Method **Bucket**
Test Pit Backfill: **Cuttings**	Location **2316 and 2318 132nd Street Southeast, Mill Creek, Washington**	

Elevation (feet)	Depth (feet)	Sample Type	Sample Number	USCS Symbol	Graphic Log	MATERIAL DESCRIPTION	REMARKS AND OTHER TESTS
	0			TPSL		4" topsoil	
				Fill		Brown silty SAND with some gravel, loose to medium dense, moist (Fill)	
						Becomes medium dense	
						Becomes gray, contains metal debris	
							10% moisture
	5			SM		Gray silty SAND with some gravel, dense, moist (Glacial Till)	8% moisture
							12% moisture
						Test Pit terminated at 7.5'	
	10						

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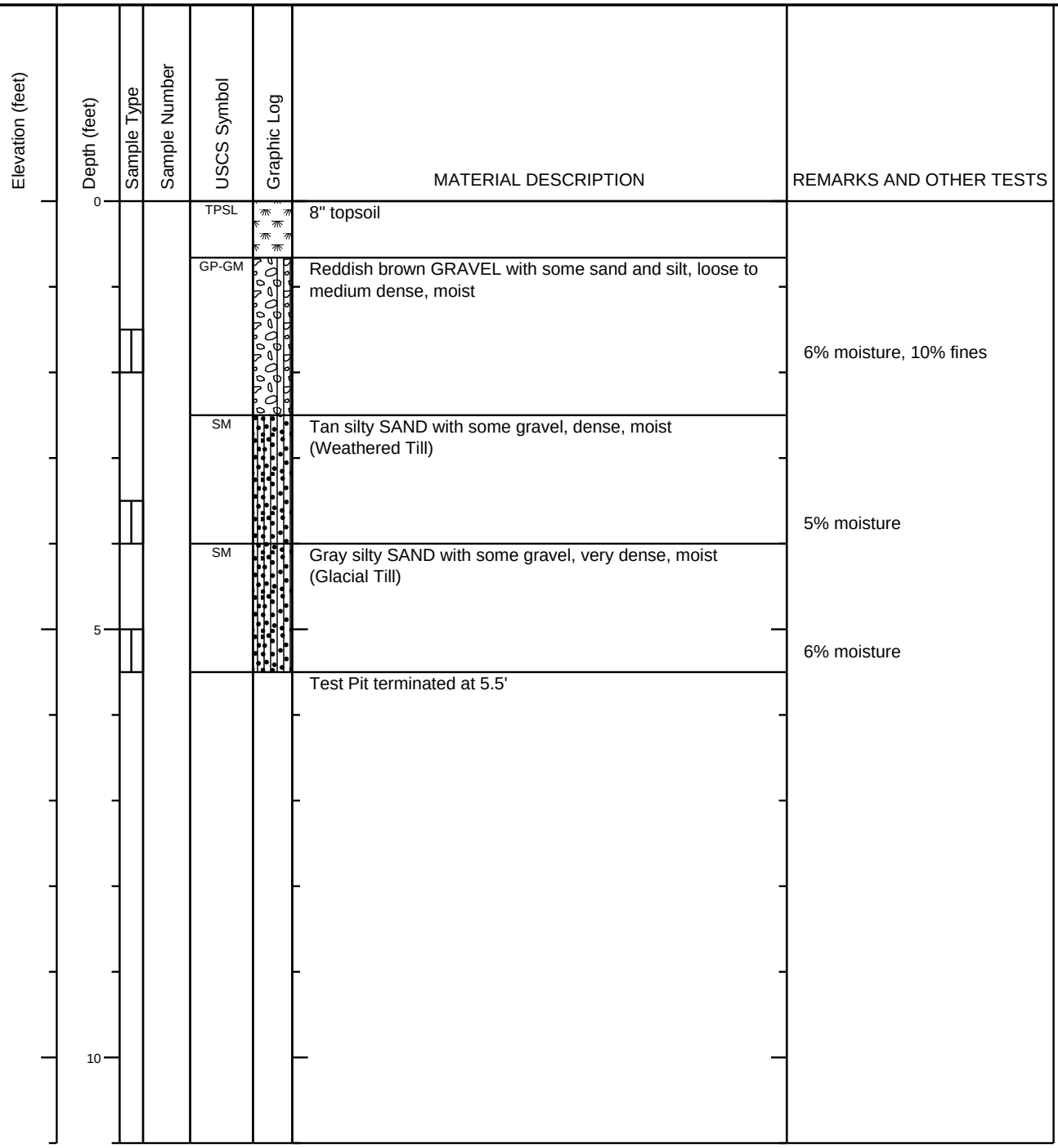
Project Name: **Crestview Village II** Project Number: **2014-169B** Client: **Crestview Village, LLC**	RILEYGROUP Test Pit No.: TP-4 **Sheet 1 of 1**

Date(s) Excavated: **7/10/2019**	Logged By **ELW**	Surface Conditions: **Mixed Brush**
Excavation Method: **Test Pit**	Bucket Size: **N/A**	Total Depth of Excavation: **5.5 feet bgs**
Excavator Type: **Mini Excavator**	Excavating Contractor: **NW Excavating**	Approximate Surface Elevation **N/A**
Groundwater Level: **Not Encountered**	Sampling Method(s) **Grab**	Compaction Method **Bucket**
Test Pit Backfill: **Cuttings**	Location **2316 and 2318 132nd Street Southeast, Mill Creek, Washington**	



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Project Name: **Crestview Village II**
Project Number: **2014-169B**
Client: **Crestview Village, LLC**

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Test Pit No.: TP-5

Sheet 1 of 1

Date(s) Excavated: **7/10/2019**	Logged By **ELW**	Surface Conditions: **Mixed Brush, Grass**
Excavation Method: **Test Pit**	Bucket Size: **N/A**	Total Depth of Excavation: **9.5 feet bgs**
Excavator Type: **Mini Excavator**	Excavating Contractor: **NW Excavating**	Approximate Surface Elevation **N/A**
Groundwater Level: **Not Encountered**	Sampling Method(s) **Grab**	Compaction Method **Bucket**
Test Pit Backfill: **Cuttings**	Location **2316 and 2318 132nd Street Southeast, Mill Creek, Washington**	

Elevation (feet)	Depth (feet)	Sample Type	Sample Number	USCS Symbol	Graphic Log	MATERIAL DESCRIPTION	REMARKS AND OTHER TESTS
	0			TPSL		4" topsoil	
				Fill		Brown silty SAND with some gravel, loose, moist	
						Contains concrete debris	
						Becomes very loose	
						Becomes brown to black, contains organics and wood debris	
							57% moisture
	5			OL		Gray mottled ORGANIC SILT, soft, moist to wet	36% moisture
						Becomes moist	
							27% moisture
				SM		Gray silty SAND with some gravel, dense, moist to wet (Glacial Till)	14% moisture
							14% moisture
	10					Test Pit terminated at 9.5'	

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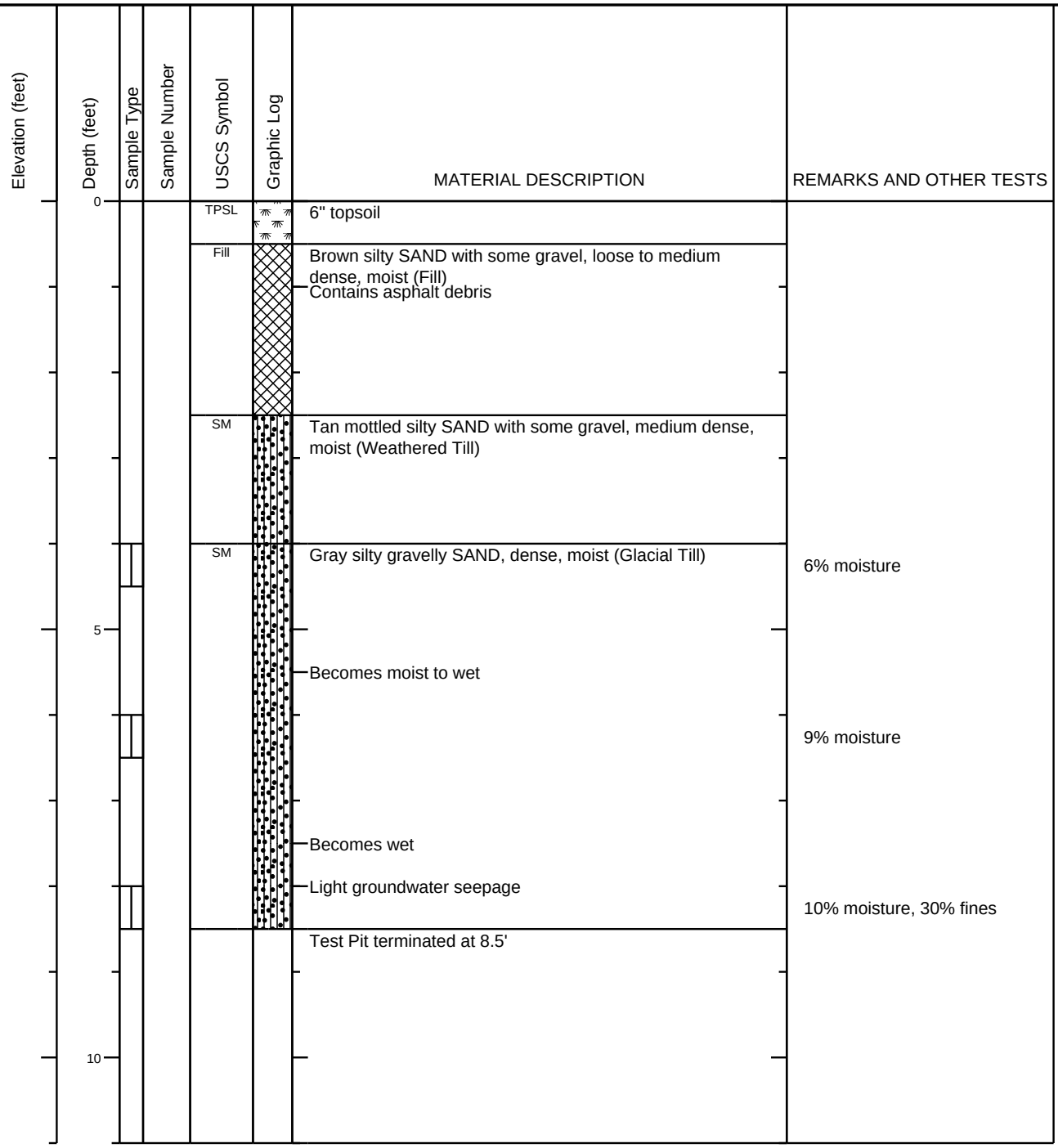
Project Name: **Crestview Village II** Project Number: **2014-169B** Client: **Crestview Village, LLC**	RILEYGROUP Test Pit No.: TP-6 **Sheet 1 of 1**

Date(s) Excavated: **7/10/2019**	Logged By **ELW**	Surface Conditions: **Mixed Brush, Grass**
Excavation Method: **Test Pit**	Bucket Size: **N/A**	Total Depth of Excavation: **8.5 feet bgs**
Excavator Type: **Mini Excavator**	Excavating Contractor: **NW Excavating**	Approximate Surface Elevation **N/A**
Groundwater Level: **Not Encountered**	Sampling Method(s) **Grab**	Compaction Method **Bucket**
Test Pit Backfill: **Well Installed**	Location **2316 and 2318 132nd Street Southeast, Mill Creek, Washington**	



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Project Name: **Crestview Village II**
Project Number: **2014-169B**
Client: **Crestview Village, LLC**

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Key to Logs

Sheet 1 of 1

Elevation (feet)	Depth (feet)	Sample Type	Sample Number	USCS Symbol	Graphic Log	MATERIAL DESCRIPTION	REMARKS AND OTHER TESTS
1	2	3	4	5	6	7	8

COLUMN DESCRIPTIONS

1. Elevation (feet): Elevation (MSL, feet).
2. Depth (feet): Depth in feet below the ground surface.
3. Sample Type: Type of soil sample collected at the depth interval shown.
4. Sample Number: Sample identification number.
5. USCS Symbol: USCS symbol of the subsurface material.
6. Graphic Log: Graphic depiction of the subsurface material encountered.
7. MATERIAL DESCRIPTION: Description of material encountered. May include consistency, moisture, color, and other descriptive text.
8. REMARKS AND OTHER TESTS: Comments and observations regarding drilling or sampling made by driller or field personnel.

FIELD AND LABORATORY TEST ABBREVIATIONS

CHEM: Chemical tests to assess corrosivity
COMP: Compaction test
CONS: One-dimensional consolidation test
LL: Liquid Limit, percent
PI: Plasticity Index, percent
SA: Sieve analysis (percent passing No. 200 Sieve)
UC: Unconfined compressive strength test, Qu, in ksf
WA: Wash sieve (percent passing No. 200 Sieve)

MATERIAL GRAPHIC SYMBOLS

AF
Poorly graded GRAVEL with Silt (GP-GM)
Low plasticity PEAT (OL)
Silty SAND (SM)
Topsoil

TYPICAL SAMPLER GRAPHIC SYMBOLS

Auger sampler
Bulk Sample
3-inch-OD California w/ brass rings
CME Sampler
Grab Sample
2.5-inch-OD Modified California w/ brass liners
Pitcher Sample
2-inch-OD unlined split spoon (SPT)
Shelby Tube (Thin-walled, fixed head)

OTHER GRAPHIC SYMBOLS

Water level (at time of drilling, ATD)
Water level (after waiting)
Minor change in material properties within a stratum
Inferred/gradational contact between strata
Queried contact between strata

GENERAL NOTES

1: Soil classifications are based on the Unified Soil Classification System. Descriptions and stratum lines are interpretive, and actual lithologic changes may be gradual. Field descriptions may have been modified to reflect results of lab tests.
2: Descriptions on these logs apply only at the specific boring locations and at the time the borings were advanced. They are not warranted to be representative of subsurface conditions at other locations or times.