



City of Puyallup  
Development Services  
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Subject: Supplementary Letter for Alternative Methods and Materials Request Application

To Puyallup Development Services,

In this letter we would like to request a deviation from City Standard Section 208.1(1) and 208.1(10) that require a roof cover, and a Type I catch basin with sewer connection, respectively, for the 9 smaller satellite recycling areas required by RM Zones Performance standards section PMC 20.25.040(8). Allowing these deviations will enhance the health, safety, and welfare of the public without posing environmental risks to the community.

First, we would like to outline the proposed onsite Trash and Recycling System for Bradley Heights. The project will be serviced by a valet trash service through which trash and recycling will be collection from outside individual apartment unit doors and delivered to either the main trash or recycling enclosures where they will be collected by the local collection company. The project has two large enclosures - one on the west side with only a trash compactor and one enclosure on the East side with only recycling. Both main enclosures will have a type I catch basin with sewer connection and roof covers and will be collected by the trash collection company as required by Section 208.1.

In addition to these two main enclosures the project is required by RM Zones Performance standards section PMC 20.25.040(8) to provide 9 additional satellite recycling-only areas (which have been grouped into 5 locations spread across the site). The areas will include smaller recycling bins (max 96 gallon) with lids and allow clean recycling only. They will be collected from on a regular basis by the apartment maintenance staff and the clean recycling will be deposited in the main recycling enclosure to be collected by the local recycling collection company.

Since these small recycling areas will not be a source of contaminated runoff, there is no need for a pad drain that would be typically required for larger trash/recycling enclosures per City Standard section 208.1(10). Further, by eliminating the requirement for a pad drain, several hundred feet of drainpipe will be eliminated, thereby reducing the chance of a failure and required maintenance.

The proposed small recycling enclosure design includes a low wall for screening as required by PMC 20.25.040(8). Covering these small enclosures would create unnecessary hidden areas and

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blind spots that would be counter to the intent of crime prevention through environmental design standards. The proposed screened areas are uncovered in order to keep the profile low and unobtrusive, which will increase sightlines across the open spaces, improving security and connectivity for the community.

Allowing a deviation from City Standard Section 208.1(1) and 208.1(10) to not require a roof cover, and a Type I catch basin with sewer connection at the small recycling enclosures will enhance the health, safety, and welfare of the public without posing environmental risks. Please find below our responses in blue to the deviation justification questions from the submitted AM&M request application form. Thank you for considering our deviation request.

### Deviation Justification

1. Describe the proposed deviation request. (What requirements is the project seeking relief from?)

Response: Proposed deviation from City Standard Section 208.1(1) and 208.1(10) to not require a roof cover, and a Type I catch basin with sewer connection for 9 smaller satellite recycling areas.

2. Describe how the proposed deviation request is based on sound engineering principles. (Explain how the granting of this modification will not result in risk or harm related to traffic, storm, drainage, water, sanitary sewer, transportation, fire protection or structural matters)

Response: The proposed small (96 gallon or less) recycling bins will have lids, no perforations, and will contain clean recycling only. Therefore, these areas will not be a source of contaminated runoff onto the parking lot and therefore there is no need for a pad drain and there is no risk or harm related to storm drainage, water, sanitary sewer or transportation matters. The recycling bins will be on concrete pads separate from the parking area and therefore will be no risk to traffic, fire protection, or structural matters. Since the recycling bins will not be a source of contaminated runoff, the requirements for environmental considerations will be fully met without a separate pad drain and structured cover.

3. Describe how a strict application of the requirement would impose an undue hardship on the applicant. What makes the project in question unique from others to allow a deviation from city standards?

Response: A typical apartment project of this type and scale will provide one or two main trash/recycling areas, which are commonly covered and provided with a drain and sewer connection as required by the PMC. Zoning requirements specific to the RM Zones require an additional 9 satellite recycling areas grouped into 5 locations distributed through the site. These recycling areas and provided containers are significantly smaller and will be

designed for clean recycling only. They will be serviced regularly by property maintenance staff instead of the garbage collection company. The small recycling areas do not pose the same environmental or safety risks as a typical trash/recycling enclosure that would require a cover and sewer connection.

By eliminating the requirement for a pad drain, several hundred feet of drainpipe will be eliminated, thereby reducing the chance of a failure and required maintenance. In addition, leaving the recycling areas uncovered will maintain sightlines across the open space, increasing security and connectivity.

4. Describe how the requirements for safety, environmental considerations, function appearance and maintainability would be fully met, assuming granting of your request.

Response: Since the recycling bins will not be a source of contaminated runoff, the requirements for environmental considerations will be fully met without a separate pad drain.

The recycling areas will be collected from on a regular basis by the apartment maintenance staff and deposited in the main recycling enclosure from which recycling will be collected by the local collection company. Recycling collection will also be augmented by a trash valet service, which will pick up recycling from outside of residents' unit doors and deliver to the main recycling enclosure. Only clean recycling will be allowed in the satellite recycling areas.

5. Describe how granting the modification provides adequate protection of public health, safety, and welfare

Response: Since the recycling bins will not be a source of contaminated runoff, there is adequate protection of public health, safety and welfare without a pad drain.

Leaving the recycling areas uncovered will maintain sightlines across the open space, increasing security and connectivity.

6. Does this request require different maintenance cycles, equipment or skills?

Since the recycling bins will not be a source of contaminated runoff, there is no need for a pad drain and the resulting drainage pipes. By eliminating the requirement for a pad drain, several hundred feet of drain pipe will be eliminated, thereby reducing the chance of a failure and required maintenance.

7. Does this request provide for a service life equal or greater than the City Requirement

Response: Since the recycling bins will not be a source of contaminated runoff, there is no need for a pad drain and the resulting drainage pipes. By eliminating the requirement for a pad drain, several hundred feet of drain pipe will be eliminated, thereby reducing the chance of a failure and required maintenance.

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8. Describe how the granting of the proposed modification will be in the best interest of the public.

Since the recycling bins will not be a source of contaminated runoff, there is no need for a pad drain and the resulting drainage pipes. By eliminating the requirement for a pad drain, several hundred feet of drain pipe will be eliminated, thereby reducing the chance of a failure and required maintenance.

Leaving the recycling areas uncovered will maintain sightlines across the open space, increasing security and connectivity.

If you have any questions or need any further clarification about the drawings or the responses please feel free to call our office at 425-454-7130.

Sincerely,

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