CES • NW
INCORPORATED
CIVIL ENGINEERING & SURVEYING

May 26, 2023

City of Puyallup
Development Services Center
333 South Meridian
Puyallup, WA 98371

RE: Sunset Pointe Preliminary Major Plat – Response to Preliminary Plat Comments
P-18-0040 (CES #04148.7)

Dear City of Puyallup,

On behalf of our client, we are resubmitting revised plans and documents to address the City's comments. Below are comments as written, with responses on how each comment has been addressed. Thank you for the opportunity to respond to the City's comments for the Sunset Pointe Preliminary Major Plat application. The following are our response to comments.

Planning – Chris Beale

1. The site appears to be marked as PENDING CLEAN UP for site contamination with the Tacoma Pierce County Health Department (TPCHD); previous SEPA comments from Ecology also indicate environmental clean up issues (see Ecology letter dated April, 2018). SEPA mitigation conditions are forthcoming regarding site environmental assessment, and possible site clean up at the direction of Ecology, to be addressed at the time of civil review. Applicant must coordinate with Ecology and/or TPCHD to resolve. February, 2022 staff follow up comment to this correct: The Ecology clean up report data was obtained in 2020 (Ecology clean up ID11739). Also see the Ecology SEPA comment letter with requirements (dated April 27, 2018) under the Toxic Clean ups section. The response report (Environmental associates phase 1 report, dated January 14, 2005) provided does not resolve this comment. Please contact the Toxic Clean ups coordinator and Ecology and obtain updated guidance on needed remediation steps to resolve site contamination issues and provide upon resubmittal.

   Response: *Please see the included Phase 1 Environmental report prepared by Earth Solutions NW, dated February 2023. Page 2. Lead was estimated to be in a concentration of 7.6 ppm in soil within and surrounding the battery casing retention wall, which is well below regulatory clean up levels. The battery casings have since been removed from the subject property and a soil berm was constructed in its place. The northern portion of the on-site pond represents a Potential Recognized Environmental Condition to the subject property.*

2. At the time of civil permit application, the applicant shall provide an access and grading plan for proposed lots 7 and 8 that demonstrates access drive will not exceed 10% slope, that storm water design will direct water to the proposed dispersion area to the west and that retaining walls needed to support access to lots 7 and 8 meet the retaining wall codes (PMC 19.12.070 (3) and PMC

20.58.005 (2)). The access tract may need to shift south to avoid conflicts and meet code which may impact final plat layout. See corresponding comments from Fire Prevention and Engineering.

Response: *Sheet P3 of the Preliminary Plat plans depicts a profile for Tract 'C'. The Tract has been shifted southerly to accommodate for a wall along the north side of the tract.*

3. All pedestrian walkways shall be dedicated as use by the public at the time of final plat; the walk way between lots 14/15, site wetlands, lots 3/5 will be a public right of way dedication at the time of final plat. These walkways shall be 15' wide right of way, and fully improved with blacktop asphalt or other approved surfacing by Public Works, 10' wide improved surface, with 24" gravel shoulders, access restrictions (bollards or other method as approved by Public Works) and landscaping, at the time of civil permitting

   Response: *The walkways proposed are 10' wide gravel paths within a 15' tract. Bollards will be provided as part of the final engineering plans.*

4. A 25' Native Growth Protection Area shall be provided on the rear of lots 13 due to slopes and protective buffer areas for 40%+ slopes and wetlands, per the Geotech report. These areas shall be landscaped and a landscape plan shall be provided for these lots during final landscape plan approval. February, 2022 staff follow up comment: Please revise the lot layout with this protection area shown on the plat sheet(s) as 40%+ area (using the same call out as on tract A) and show buffer setback.

   Response: Based the slope analysis, the area in the rear of Lot 13 is not a 40% slope. Therefore, a 25-foot buffer is not depicted on the plans.

5. Other conditions outlined in the December 2020 DRT letter remain in effect and will be carried forward to the Hearing Examiner once all issues related to the plat are resolved.

   Response: *Thank you, acknowledged.*

Engineering – Joseph Berkley

6. Documents reviewed: Although comments were addressed in the December 30, 2021 letter, very few actual updates were presented to reviewers. The following list summarizes documents reviewed. If there are any newer versions of these documents, they were not included in the most recent submittal and were not reviewed.

12/15/2020	Updated grading plan (sheet P2)
10/23/2020	Site Plans Sheets 1-5
10/23/2020	Geotechnical Addendum
10/1/2020	Revised Storm Report
6/25/2019	Geo report updated
6/25/2019	Storm report updated
9/21/2018	Critical Areas Report updated

Response: *ESNW Geotechnical Report Updated 5/26/2023, ESNW Phase 1 Report 2/10/2023, ESNW Ground Water Monitoring Summary 5/25/2023, Asbestos Cleanup Letter 8/10/2018, Orion Environmental Services Polarized Light Microscopy Test Report 8/1/2018.*

7. First and foremost, there will be no further review of the civil portion of the Major Plat due to the non-response to repeated requests for detailed long term ground water monitoring. In addition, 2 test pits are not adequate for a site this size. Infiltration must be shown as infeasible in order for the project to claim that it is infeasible and not use it. Provide detailed accounts of testing and tabulated results.

   Response:. *ESNW performed a groundwater monitoring program for the site at three of the previously installed shallow wells. The results of the program and applicable design recommendations have been provided in a summary letter included in this submittal.*

8. The following City comment is to address the Engineers response to a previous City comment: PREVIOUS CITY COMMENT (12/31/2020): The State highway basin does not meet the criteria for full dispersion. The total impervious area exceeds the 10 percent threshold. The overall site is 13.319 acres (2.579 acre onsite plus 10.74-acre native easement). The total impervious is 1.62 acres (.59 acres within the roadway and tracts as measure of drawing plus .844 acres for roof plus .184 acres for driveways). The impervious percentage equals 12.2%. Also, the eastern most flow path slope exceeds 15% based on existing contours. Please revise stormwater report to address this issue. RESPONSE FROM CLIENT'S ENGINEER (12/30/2021): The storm drainage report will reduce the amount of roof area to 3,600 square feet per lot for a total of 0.66 acres, 0.184 acres driveway (average of 1,000 sf per lot) and 0.474 acres of roadway. The basin will have a total of 1.318 acres which meets the ten (10) percent threshold. CITY COMMENT ON RESPONSE: It is unclear to reviewers how the roadway will be reduced from 0.59 acres to 0.474. Although a Storm Report and Plans were submitted with this response, the documents either had not been updated since October 2020, or it was not made clear which portions of the documents had been updated. They are both still showing a date of October 2020 which is before the 4th correction notice; from which these comments came, was issued. The client will need to clearly demonstrate on the Civil Plans that the roadway impervious has been reduced and that the total basin meets the 10% requirement. Also, eastern most flow path slope comment not addressed. Revise stormwater report to address these issues.

   Response: The storm drainage report has been updated to address this comment. The State Highway basin depicts the impervious area as 1.27 acres and the overall basin is 13.54 acres. This is approximately 9.4 percent which meets the ten percent threshold.

9. The following City comment is to address the Engineers response to a previous City comment: PREVIOUS CITY COMMENT (12/31/2020): A portion of lot 6 and 7 and all of lot 8, tract C and the proposed 5' walkway is graded towards the north east. The storm report shows a portion of this as a bypass basin that is included in the Shaw Road basin. The bypass basin does not match the grading. Show how the increase in runoff for the northeast corner of the plat will be mitigated? Please revise stormwater report and provide a qualitative description/analysis to address this issue. RESPONSE FROM CLIENT'S ENGINEER (12/30/2021): The proposed drainage for these

lots is being directed to the dispersion area to the north. The post developed basin shows a small bypass area which has been accounted for in the drainage model. CITY COMMENT ON RESPONSE: It will need to be clearly demonstrated on the civil plans how the water is being conveyed from the lots to the dispersion system. Also clearly demonstrated and described will be the bypass scheme for this basin. The current submittal does not provide enough detail to completely review the drainage in relation to the basins.

Response: *The basin maps and the storm report have been revised to address this comment.*

10. PREVIOUS CITY COMMENT (12/31/2020): The access tract shown the storm pond is 20'; City Engineering standards requires a 40' easement. Previous response noted that an AMR will be submitted to reduce the width at the time of Civil Permit. If the AMR is not approved the buildable area of lot 16 will be impacted. Either the easement shall be widened as part of the preliminary Plat or the AMR shall be submitted and approved prior to Preliminary Plat approval; please address this upon resubmittal. RESPONSE FROM CLIENT'S ENGINEER (12/31/2021): Attached is the AMR requesting the reduction of the easement width. CITY COMMENT ON RESPONSE: After further review and discussion the city has determined that an easement is not required because it is in a dedicated tract. City Standard 206(2) discusses the requirements:

    Publicly maintained water quality and R/D facilities shall be located in tracts dedicated to the City. The size of the tract shall be based on the size of the stormwater facility. At a minimum, the tract shall include the entire facility, site access area, and at least 5-feet of clearance around the facility. All publicly owned and maintained stormwater tracts/parcels shall be fenced at the property line. Fencing shall meet the minimum requirements of City Standard Detail 06.01.08 – Type 1, Chain Link Fence.

    Section 205.2 of the City Standards requires the access road in a tract to be a minimum of 15 feet wide. Employing the minimum 5-foot buffer to each side of the access road would result in a 25-foot access road within Tract B with the pipe centered in the access road.

    Response: *The preliminary plat layout has been revised to move Tract 'B' to the north end of the cul-de-sac eliminating the access easement.*

11. PREVIOUS CITY COMMENT (12/31/2020): The storm pond does not meet City Stormwater Standards; revise the design upon resubmittal addressing the following issues. a. The Storm pond shall setback 20' from any property line. b. The storm pond is located within a steep slope buffer. Per the DOE stormwater manual, the facility shall not be located above a slope that exceeds 15%. c. The Drainage Report models to have a bottom that is 79.1' by 79.1'. The bottom of the pond shown on the preliminary plat is approximately half that size. d. The storm pond will be City owned infrastructure. The city does not accept its current location above a steep slope that leads to a wetland. This configuration will likely case additional maintenance and has a potential for failure over time. The pond shall be relocated to a more suitable location outside of any critical areas or buffers. RESPONSE FROM CLIENT'S ENGINEER (12/30/2021): a. Please provide specific location

where the pond does not meet the 20-feet b. The geotechnic engineer addressed this in their previous memo c. The pond bottom is 60 x 120 feet which is approximately the same area d. The previous Geotechnical Engineering memo addressed the location of the proposed pond in relation to the steep slope CITY COMMENT ON RESPONSE: a. Ensure that the pond is a minimum of 20-feet from any structure, property line, or vegetative buffer and 50-feet from steep slopes per Volume V, Chapter 10.3 of the SWMMWW. b. Cannot locate information in "previous memo". Specify document version and page number where this is addressed. Reviewers read the 6/24/2019 updated Geotech report, the 10/23/2020 addendum to the Geotechnical Report and the updated October 2020 Storm Report and cannot find any mention of how the design will conform to the Ecology Manual's provisions for ponds near steep slopes and, in fact, these documents still refer sporadically to a stormwater vault. c. Model the pond as it is proposed to be constructed. d. See Comment on Response 8.b.

Response: *The storm report and plans have been revised to address this comment. A pond is not being proposed for the Shaw Road Basin. The roadway is being collected and treated prior to discharging to a dispersion trench in tract 'B'.*

12. PREVIOUS CITY COMMENT (12/31/2020): The storm design does not adequately show that the project meets MR #8 of the 2014 DOE Stormwater Manual. Please revise stormwater report to address this issue. a. The Hydroperiod needs to match the guidance included in Appendix I-D. Provide a revised analysis/design that shows the project meets MR #8. The hydraulic analysis shall also be evaluated by the project wetland Biologist to verify that there is no new loss. b. The three consecutive wetlands have been modeled as one wetland. The conveyance between wetland A and B appears undersized. Provide an analysis that show the three are hydraulically connected to function as one. RESPONSE FROM CLIENT'S ENGINEER (12/30/2021): a. The wetland biologist reviewed the analysis and the calculations to verify there is no new loss b. Please provide direction on what the city would consider the critical path with regards to the wetland and drainage. The intent was to preserve the wetland removing and replacing culverts will impact the wetland and require mitigation. CITY COMMENT ON RESPONSE: a The direction from the City was to revise the stormwater report and analysis to demonstrate to reviewers that the project meets Minimum Requirement #8. b. The critical path is conforming with applicable City and State design standards. Provide an analysis that demonstrates proper culvert capacity and that the wetlands are hydraulically connected.

Response: *The storm report has been revised to provide a hydroperiod analysis of the buffer area, based on the current 2019 Stormwater Management Manual for Western Washington as adopted by the City of Puyallup.*

13. PREVIOUS CITY COMMENT (12/31/2020): The storm report does not provide enough information to determine how the wetlands and storm system will function. Once the storm pond is constructed the wetland will function as part of the onsite storm system. a. The existing culvert between Wetland A&B appears undersize for the volume of water that is being contributed to wetland A from the adjacent neighborhood. b. Provide a complete hydraulic analysis of the wetlands, ex culvert/control structure, inlet to the wetlands and outlet.

c. As part of the analysis show how the downstream storm system will be affected by any changes to the existing wetlands hydraulics. RESPONSE FROM CLIENT'S ENGINEER (12/30/2021): a. The wetland has functioned for several years in the existing condition. The intent of the storm design was to maintain the wetland hydrology while meeting the flow control requirements. Adjusting or changing the wetland culverts will impact the wetland function. Is the city suggestion we replace the 3 existing culverts so the drainage can flowthrough the wetlands? A note can be placed on the plans indicating the culvert replacement. b. An analysis was provided in the preliminary storm report. c. It was not our intention to change the downstream hydraulics. CITY COMMENT ON RESPONSE: a. The existing condition is being changed by the development. Since it is the applicant that wants to discharge to the wetlands, thereby altering the historical function, it shall be the applicant that demonstrates compliance with local regulations. b. The analysis shall be enhanced prior to civil submittal to include details about the proposed control structure, inlet and outlet to and from wetlands, and capacity of the system onsite and downstream. C. All new development impacts the downstream areas and hydraulics.

Response: *A hydroperiod analysis for the buffer area has been provided in the revised stormwater drainage report.*

Additional Comments

14. Geotech Report and other documentation still refer to a detention vault and older lot configurations. Ensure that all documents including reports, plans and model outputs on subsequent submittals represent the most current design. Any reference to design elements that are not part of the project will result in the review being halted. This will help lower the amount of subsequent reviews and re-submittals.

    Response: *The revised ESNW Geotechnical Report dated May 26, 2023 has been revised with the latest site plan.*

15. The modeling and the design discount groundwater. Wet weather modeling to determine the peak groundwater level to inform pond and general site design is required. See #3 under Engineering Conditions from DRT Letter #4. Display results of wet weather monitoring in detail including groundwater levels on particular wet weather dates showing a peak over a specific period of time.

    Response: *ESNW performed a groundwater monitoring program for the site at three of the previously installed shallow wells. The results of the program and applicable design recommendations have been provided in a summary letter included in this submittal.*

16. The Stormwater Report claims that the State Highway Basin is dispersed over a full ¼ mile, but the easement is only for 100 feet. If the full quarter mile is to be used for stormwater dispersion, then the size of the easement (unbuildable area) must be commensurate. In addition:

    Response: *An easement will be provided as part of the final engineering approval.*

17. Dispersion area is located in right of way. Unless it was previously discussed by past reviewers, CBs #14. #16, and #18 should be relocated to the future curbline within the newly dedicated ROW on 19th Ave SE and the dispersion infrastructure moved outside of the ROW not only for 19th Ave SE, but for the future dedication of 21st St E.

Response: *The location of the catch basins has been relocated outside of the right-of-way on the revised plans.*

18. The area proposed for the dispersion paths needs to be a part of the project. Either an easement or a dedicated tract (City Standard 206(2)).

Response: *An easement will be provided as part of the final engineering approval.*

19. According to documents submitted by the applicant there are wetlands and slopes that may exceed regulations for dispersion on parcel number 0420353009. There are also wetlands on the west side of 21st St E. Dispersion is not allowed in critical area buffers or on slopes exceeding 20%. Provide rational or revise, clearly indicating all wetlands and buffers.

Response: *The100-foot flow path for the dispersion trenches for the State Highway basin are not located in an area of 20% slopes and outside of the buffer area of the critical areas.*

We believe this response letter will meet the intent of a response to the review comments. Please review the resubmittal documents at your earliest convenience. Please call should you have any questions.

Sincerely,

Craig Deaver
Principal
Prepared by DS

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