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May 10, 2024

City of Puyallup
333 S Meridian
Puyallup, WA 98371

Subject: Easton Manor – Senior Housing CUP Review
PLCUP20220149
AGC Job #2243

Please find attached our resubmittal of CUP review materials with revisions in response to the review comments dated May 11, 2024. This submittal consists of the following:

- Revised site plan set – sheets A-0.1 – A-2.2
- Revised Preliminary Storm plan, sheet P1
- Revised preliminary SS & Water plan, sheet P2
- Preliminary Fire system plan, sheet P3
- Revised Drainage Report
- Fire truck AutoTurn exhibit
- Entering Sight Distance exhibits
- Revised Habitat Assessment/Wetland Report

Following are responses to review comments:

Planning Review - Rachael N. Brown; (253) 770-3363; RNBrown@PuyallupWA.gov

- Additional Submittal Item Required: Lot Combination Permit Application required. Application form can be downloaded from the City website at <https://www.cityofpuyallup.org/DocumentCenter/View/11646/Lot-Combination-Application>. Combination of all lots that include buildings that cross property lines is required.
 - Lot Combination Permit application will be submitted with building permit applications.
- Show property lines on all site plans.
 - Property lines are shown on all site plans.
- Max allowed square footage for FAR for project is 292,113 sf, please correct on site plan.
 - It is corrected. Please see the updated site plan.
- Could a patio be added for each ground floor resident? [Sheet A-2.2]
 - Patio is added for each ground floor unit.
- Where is the street side entrance with a connection to the sidewalk on 25th St SE? [Sheet A 2.2]
 - Connection from building to street side sidewalk added, two connections of

internal walkways to street side sidewalk included.

- It is unclear exactly how the proposed design meets the following requirement: PMC 20.26.200

(4) (b) (iii) Angled facets, at least two per required building wall interval, including bay windows, covered entrances, and other similar features projecting out from the front facade at least three feet. There does appear to be the 2ft wall intervals however, I do not see any bay windows projecting 3ft out from those intervals?

- Bay windows are 3 ft out. Each building has different modulation and finish materials. They look different but harmony in terms of architectural style.
- 3 elements from PMC 20.26.200(5) (b) are required. 2 of the items are clearly met by the proposal, however please select from either (i) Awnings or canopies above or window boxes below every window of an entire story or building interval grouping to distinguish one section of a building from another, OR (ii) Variation in the number of stories between intervals of the building and demonstrate how your proposal meets this requirement in order to satisfy the requirement for a total of 3 elements in this section.
 - Please see the updated design. Wood trellis canopies are added.
- (b) Multiple buildings on a single site shall not be exact or close replicas of each other. While common materials, colors and styles are acceptable, each building shall be unique in terms of its general massing design and fenestration design. Variety in designs shall be achieved by variation in each building's footprint, rooflines, facade modulation, and window arrangement. Color and materials shall also be varied. The proposed buildings are all identical, just mirrored, they are therefore 'close replicas' of each other. Please revise.
 - Each building has different modulation, floor layout and exterior finish materials. They look different but harmony in terms of architectural style.
- Carports shall not exceed 72 ft in length, please revise.
 - Carports broken up to meet this requirement.
- Parking stalls shall not be located nor positioned to cause headlights to shine into windows of residential units. Alternatively, provide landscape plan that shows that all parking stalls that directly abut windows will be screened from windows with landscaping.
 - Landscape and wood fence at ground level will provide shield for headlights.

Building Review - Janelle Montgomery; (253) 770-3328; JMontgomery@PuyallupWA.gov

- The code reference on plans are 2018 I-codes. Upon submitting for building permits update all plans to meet 2021 I-codes. As of July 1, 2023, the State will adopt 2021 I-codes with Washington State Amendments which has significant changes.
 - The code reference on plans are updated to 2021 IBC.
- A separate demolition permit will be required for the demo of the structures currently on the site and will require documentation from the Puget Sound Clean Air agency at the time of submittal for the demo permit.



- Acknowledged.
- This property contains floodplain or wetland areas that may require flood venting as part of the foundation plan and Elevation Certificate submitted to City Engineer. Will need show complete details for the required flood vents. Inclusion of and proper placement of the flood vents in the foundation (if applicable depending on building foundation type) are part of the building review. Provide calculations and size provided with manufacture's specifications on vents.

- Acknowledged, will provide required data with building permit submittal.

- Provide Electrical Vehicle Car Charging parking stalls on the parking plan. Review WAC 51-50- 0429 and Section 429 of the IBC for Electric vehicle charging infrastructure. Effective July 1, 2023, Group I occupancies will require 10% EV charging stations. See Table 429.2 in IBC Section 429 (Washington State Amendments) to meet all requirements.

***Include in the parking calculations handicap stalls and Electric Vehicle Charging stations. Reflect locations on parking lot plan locations of required EV parking stalls and number to be handicap accessible.

- Site plan updated to show EV and ADA parking stalls.

- Additional Submittal Item: Provide a Geo-Tech report for soils with the building permit applications.

- Acknowledged.

- Informational Only:

1. Plans need to be complete with all building, plumbing, mechanical, energy code and accessibility requirements items on plans.

3. Need to submit all truss specs with building permit application.

4. Need to show the type A and B units and all specific details on the plans.

5. Clearly define all fire rated assemblies on the plans in detail.

6. All electrical is through the department of L & I electrical division.

7. Need to define all required accessible parking spaces. Accessible parking and access to the public way will be required. For all accessible requirements the City adopted the 2018 IBC / WAC 51-50 and the ICC A117.1-2009 standard.

- Acknowledged.

Fire Review - David Drake; (253) 864-4171; DDrake@PuyallupWA.gov

- Verify available fire flow for accordance with IFC Appendix B and loop water main in accordance with Puyallup Municipal Code 16.08.
 - Per e-mail conversation with David Drake, we acknowledge this requirement. The design already calls for a looped system and fire flow will be verified at time of building permit application.
- The entrances shall meet ladder truck fire apparatus truck turning radiuses and approval of the angle of inclination.
 - The entrances are per City standard detail for driveway approach. An AutoTurn diagram is included to show a fire truck can navigate through the site.



- Provide F.D.C, and P.I.V locations to determine code compliance.
 - Created new sheet P3 with fire system layout.
- Provide Fire Hydrant locations, Fire Hydrants are required to reach the building within 400'.
 - This information was on sheet P2. Created new sheet P3 with fire system layout.
- A Fire Hydrant will be required to reach all points of the SFR's within 600'.
 - The existing and proposed hydrants meet this requirement, see sheet P3.
- Fire Hydrants shall be at least 50' from the structure and the FDC supporting the fire sprinkler system shall be no closer than 10' and no greater than 15' from the hydrant.
 - This requirement is met, see sheet P3.
- P.I.V., F.D.C, and Fire Hydrants can not be blocked by parking stalls. All shall be placed in parking islands.
 - This requirement is met, see sheet P3.
- Fire access road shall be no greater than 150' from the furthest point of the structure per PMC 16.04.025 (4) 503.1.1.
 - All buildings meet this requirement. Added hammerhead to access to existing residence to meet this requirement.
- Auto-turn or equivalent program required to demonstrate code compliance.
 - AutoTurn analysis included with resubmittal.
- Maximum road grade shall be 10%
 - Acknowledged, current grading concept meets this requirement.
- Driveways or Tracts greater than 150' will require a Fire Truck turn-around.
 - A hammerhead per Appendix D has been added to the driveway to the existing house.
- Comply with Appendix "D" for fire access turnaround.
 - The emergency vehicle route through the site and the hammerhead added to the driveway to the existing house meet the Appendix D hammerhead requirements.
- The East to West Road on the North side of the project going to the SFR will require the turnaround.
 - Turnaround added.
- Compact stalls will not be allowed along fire lane due to the possibility of larger vehicles overhanging into fire lane.
 - Acknowledged, there are no compact stalls along designated fire lane.
- Central Pierce Fire & Rescue is asking for a different road layout. What is the status?
 - Per e-mail conversation I understand this to be an internal comment that might come up on SEPA.
- All vaults in the Fire Lane will be required to be fire apparatus rated for 75,000lbs.
 - Acknowledged.

Engineering Review - Anthony Hulse; (253) 841-5553; AHulse@PuyallupWA.gov



• See CUP application required site plan information.



- Updated site plan.
- Provide survey bearings.
 - Added boundary bearings and distances.
- Show water, sewer and stormwater mains within 21st and 25th St SE.
 - Added existing utilities. See P2.
- Provide a legend for the site plan.
 - Added call outs
- ◆ The city has adopted the 2019 Ecology Manual. Revise the report reference. [drainage report, pg 1]
 - Manual reference revised.
- Provide the right of way widths for 21st and 25th St SE. [site plan]
 - Added widths.
- Show existing and proposed contours [site plan]
 - Added contours.
- Show the regulated AE floodplain and base flood elevation. [site plan]
 - Added floodplain.
- Provide the cut and fill amounts proposed for the project. How is the project proposing to mitigate the 1:1 compensatory storage to floodplain impacts?
 - Cut and fill volumes added to sheet P1. Compensatory storage is depicted on sheet P1, and described on page 5 of the preliminary drainage report. A table of compensatory storage calculation has been added to the report.
- Provide additional sheets showing preliminary grading, drainage and frontage/lighting plan.
 - Sheet P1 already shows preliminary grading and drainage. Frontages already include curb, gutter and sidewalk. In 25th there is an existing streetlight on a power pole, this light is adequate for the 300 foot spacing. In 21st, there is an existing streetlight on a powerpole at the intersection with 7th Ave, this light is adequate for 300 foot spacing. Callouts to these lights have been added to sheet P1.
- Provide preliminary floodplain information showing how the development will meet the equivalent elevation requirement for 1:1 fill to compensatory storage. See PMC 21.07.060. [Drainage Report]
 - Added table of volumes to page 5 of the preliminary drainage report to show compensatory storage volume requirements are met.
- Show the pedestrian access route from the public right of way to on-site structures. [site plan]
 - ADA accessible route added to site plan.
- ◆ Include the following flow charts within the preliminary drainage report: Figure III-1.1: Runoff Treatment BMP Selection Flow Chart and Figure I-3.5 Flow chart for determining wetland protection level requirements. [drainage report, pg 2].
 - Added flowcharts.
- Is the geotech report still being modified? Why is this a draft? [drainage report, pg 46]
 - Final version of report was obtained after original submittal and is included with this submittal.

Still have pasture modeled in the pre-developed conditions.

- Show the proposed 40' wide wetland buffer. [site plan]
 - Added wetland buffer to site plan.
- Revise the reference to the 2005 WDOE manual to the currently adopted 2019 Ecology Manual. [Biological Assessment, pg 12]
 - Biological Assessment revised.
- The biological habitat assessment and preliminary storm report floodplain information conflicts. This area has been re-mapped by FEMA and is within the regulated AE floodplain with an established base flood elevation, revise accordingly.
 - Habitat assessment has been revised.
- Show proposed preliminary stormwater mitigation on a separate sheet. [site plan]
 - Sheet P1 is the preliminary storm plan.
- Per the critical area report, the wetland on the NE side of the development is deemed a category IV wetland with a habitat score greater than 5, provide additional information as to how the wetland will meet the following requirements of the DOE manual for Minimum Requirement 8: General Protection, Protection from Pollutants and Wetland Hydroperiod Protection (method 2) [drainage report, pg 4]
 - Added flowchart to report and discussion to MR#8.
- Per minimum requirement #7, the pre-developed site condition must be modeled as forested land cover unless reasonable, historic information is provided that indicates the site was prairie prior to settlement. Revise the calculation or provide additional information. [drainage report, pg 6]
 - Per flowchart Figure I-3.1, the Minimum Requirements apply to "converted vegetation areas." This means area of forest converted to lawn/landscaping. The existing vegetated areas are not forested and therefore, the Minimum Requirements do not apply and they can be treated as pasture in existing conditions. This is explained under MR#7 and also in the "Flow Control" section of the report.
- Provide a downstream analysis to ensure both onsite and off-site has capacity to convey at a minimum the 25 year storm flow event, assuming developed conditions for onsite tributary areas, and existing conditions for any offsite tributary areas. [drainage report, pg 3]
 - A downstream analysis section has been added to the drainage report. Note that because the project results in a significant reduction in peak runoff rates, an actual quantitative analysis should not be required.
- Provide a basin map to supplement the flow control WWHM calculation. [drainage report, pg 8]
 - Added basin map to report.
- Section 2.6.2 of the Volume 1 of the SMMWW requires: An initial qualitative analysis shall extend downstream for the entire flow path from the project site to the receiving water or up to one mile, whichever is less. If a receiving water is within one-quarter mile, the analysis shall extend within the receiving water to one-quarter mile from the project site. The analysis shall extend one-quarter mile beyond any



improvements proposed as mitigation. The analysis must extend upstream to a point where any backwater effects created by the project cease. Upon review of the qualitative analysis, the local project reviewer may require that a quantitative analysis be performed. [drainage report, pg 3]

- I Added qualitative downstream analysis section to report.
- Show existing easements. There is a stream easement relocation agreement here. [site plan]
 - This easement is on the adjacent site, not part of this development. Added easement to sheet P1.
- Provide a preliminary frontage plan showing proposed improvements. The traffic pre-app notes indicated the following improvements: 25th St SE: 30' wide commercial access onto 25th St SE, 2 city standard streetlights, and replacing the existing curb cuts with curb, gutter and planting strips. 21st St SE: Provide a 30' commercial access approach and street light. [site plan]
 - The proposed improvements have been added with callouts to sheet P-1.
- Show on-site routing of water, sewer and storm utilities. [site plan, pg 1]
 - The requested data would unnecessarily clutter the site plan and is already shown on the preliminary engineering plans. Sheet P1 is the preliminary storm and grading plan, sheet P2 is the preliminary water and sewer plan.

Engineering Traffic Review - Mieco Hutchens; (253) 841-5430; mhutchens@puyallupwa.gov

- Per Puyallup Municipal Code Section 11.08.135, the applicant/owner would be expected to construct half-street improvements including curb, gutter, planter strip, sidewalk, roadway base, pavement, and street lighting. The extent of paving would be determined based on current condition. Any existing improvements which are damaged now or during construction, or which do not meet current City Standards, shall be replaced.
 - Half-street improvements to 25th St SE were installed in 2015 for the short plat of that property. 21st St SE is already improved with curb, gutter and sidewalk.
- (2) City Standard Street Lights will be required along 25th ST SE Frontage
 - Added two streetlights to sheet P1. This will require relocation of two existing power poles and relocation of overhead utilities to underground along most of the frontage.
- New Streetlight required at 21st ST SE / 7th AVE SE intersection
 - There is an existing streetlight on a power pole at the SW corner of the intersection. Based on this, and existing overhead utilities, we request that either this requirement be dropped, or that a location on the east side of 21st approximately 120 feet south of the intersection be found acceptable.
- 30ft wide commercial access required on 21st ST SE
 - Added callout for 30' wide approach on sheet P1.
- Remove obsolete curb cuts and show planned curb/gutter/sidewalk panels and planter strips Site Plan pg A-0.1
 - Added callout to sheet P1.
- Per City Standard 101.10.1 - Minimum driveway spacing standard



not met Site Plan pg A-0.1

- Revised access configuration to eliminate driveway on north side of project and incorporate existing access on south side of project.
- 30ft wide commercial access required Site Plan pg A-0.1
 - Revised approach to 30' wide City std 01.02.17
- Provide an Autoturn Analysis
 - It is not clear why an AutoTurn analysis would be necessary for a basic parking lot. This submittal includes an AutoTurn analysis for fire truck which I believe should allay any concern.

Traffic Scoping

- Comment is unclear. Scoping worksheet was included with application.
- Submit sight distance analysis of the proposed driveways. Please provide photo documentation within the report of the sight distance analysis. The photo must show the location of the sight distance standard in the picture as well as the location of the viewer. If photo cannot be provided, plan sheets with plan and profile within the report can also provide the sight distance documentation. If this method is used, place the distance requirements as met on those documents and provide this information within the appendix of the report.
 - ESD exhibit included with resubmittal.
- Civil submittal shall include detailed striping/signage plan.
 - Acknowledged.
- Show preliminary location of city standard street lighting Site Plan pg A-0.1
 - Added streetlights to sheet P1.
- Align driveway centerline with 7th AVE SE Site Plan pg A-0.1
 - Driveway shifted to align.
- Coordinate with garbage service provider to assess proposed pickup locations Site Plan pg A-0.1
 - We have sent site plan to Murreys and are waiting for a response.
- This garbage enclosure could cause sight distance obstructions for out bound vehicles Relocate Site Plan pg A-0.1
 - Trash enclosures relocated
- Park Impact Fee (Per residential dwelling Unit): Less than 500 sqft \$1,560.05
500 - 999 sqft \$2,313.53
1,000 – 1,999 sqft \$3,291.31
2,000 sqft or more \$4,017.30
 - Acknowledged.

External Agency Review - Rachael N. Brown; (253) 770-3363; RNBrown@PuyallupWA.gov

- Per comment from the Puyallup Tribe: The project is located in an area with known cultural resources and traditional use areas. This project has a high probability for



encountering cultural resources important to the Puyallup Tribe. The Puyallup tribe is requesting an Archaeological survey be completed prior to this project beginning. The City of Puyallup will be honoring this request and a SEPA Mitigation measure outlining the requirements for the Archeological Survey will be included in the forthcoming SEPA Determination.

- Acknowledged.
- Revisions to the Habitat Assessment and wetland report are required. Figure 7 of the wetland report is corrupted and cannot be viewed correctly. See the two review letters from City's 3rd party review biologists dated March 31, 2023 for list of required changes.
- Habitat Assessment and wetland report revised and included with this resubmittal.

CONDITIONS

Planning Division - Rachael N. Brown; 2537703363; RNBrown@PuyallupWA.gov

- General: Public notice sign must be posted on site in a publicly visible location.
 - Sign has been posted.

Planning Division - Rachael N. Brown; 2537703363; RNBrown@PuyallupWA.gov

- General: Signed Affidavit must be provided.
 - Sign declaration was submitted via e-mail to Navila on March 7, 2023.

Please call or e-mail if you have any questions or need additional information to process.

Sincerely,



Robert A. Trivitt, PE
Project Manager

