



CITY OF PUYALLUP

Development Services Center

333 S. Meridian, Puyallup, WA 98371
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www.cityofpuyallup.org

February 5, 2019

ATTN: Jennifer Caldwell, Senior Planner
C.E.S NW, Inc.
310 29th Street NE, Suite 101
Puyallup, Washington 98372

EMAIL: jcaldwell@cesnwinc.com

DEVELOPMENT REVIEW TEAM (DRT) LETTER	
PERMIT ID #	P-18-0040
PROJECT NAME	SUNSET POINTE
PERMIT TYPE	PRELIMINARY MAJOR PLAT
PROJECT DESCRIPTION	SUBDIVIDE (3) LOTS INTO (23) LOTS; TRACTS WITH WETLANDS, PONDS & OPEN SPACE
SITE ADDRESS AND PARCEL #	2301 23 RD ST SE
ASSOCIATED LAND USE PERMIT(S)	P-09-0083 (pre-application conference); P-17-0082 (pre-application conference)
APPLICATION DATE	3.15.18
APPLICATION COMPLETE DATE	4.05.18
PROJECT STATUS	Active Development Review Team (DRT) review case. Please address review comments below and resubmit revised permit materials and by responding in writing to the remaining items that need to be addressed.
APPROVAL EXPIRES	N/A – Active permit application, not approved
CONDITIONS	N/A – Active permit application, not approved

Staff has reviewed the above referenced application. The following revisions shall be made in order for the proposed application to comply with the Puyallup Municipal Code.

NOTE: Items referenced by a checkmark (✓) indicate previous review comments that have been fulfilled by the most recent submittal or items that will be addressed during subsequent review stages (e.g. Civil and/or building permit review). Items referenced by a bullet point (●) are outstanding items that shall be addressed by the applicant. When resubmitting permit materials please be sure to format a written response to all pending comments as denoted by a bullet point (●). If you have questions regarding the requests or conditions, please contact the appropriate staff member directly using the phone number and/or email provided.

PLANNING – Chris Beale (253) 841-5418 cbeale@ci.puyallup.wa.us

- The project no longer proposes platting the lot to the north which adjoins with the stubbed out Highland Drive; as such, previous comments regarding roadway connectivity no longer apply. At such time that the owner proposes to plat that lot in the future, possible roadway connectivity requirements may apply. The Hearing Examiner may consider conditions regarding dedicated right of way.
- The subdivision layout does not adhere to the city's standards regarding panhandle lot access ("Panhandle access will only be allowed when separated by at least one lot width"). Panhandles must be separated by at least one lot width. Lot 3, 4, and 5 are all considered panhandle lots.
- Lot #1 still does not have frontage access on a street (public or private).
- The height and location of perimeter retaining walls must be addressed now and cannot be deferred to civil and building. Please address ground water seepage concerns and address how increased grade height along the Kodiak Estates property line would affect access to solar for those existing, abutting lots.
- Please have your Geotech re-review notes from DRT letter #1 and **respond to all comments made regarding geo hazard areas.**
- The comments seems to be altered, and no longer reference lots that were described as meeting geohazard designation and do not address comments made previously.
- Areas of the site between 15 and 39.9% slope must be examined using the following criteria. Please describe in detail how each part of the development between 15-39.9% slope does or does not meet the following:
 - Areas with all three of the following characteristics:
 - (A) Slopes steeper than 15 percent;
 - (B) Hillsides intersecting geologic contacts with a relatively permeable sediment overlying a relatively impermeable sediment or bedrock; and
 - (C) Springs or groundwater seepage.
- The report also does not address, point by point, how the development and "alteration of slopes less than 40 percent, including slopes of 15 percent or less that have **unstable** (...) **drainage characteristics**" meet the development standards of the code.
- The Geotech engineer clearly states that unstable ground water seeps are expected throughout the site; as such, areas over 15 slope on the site may be modified only under findings from your Geotech that address a detailed seepage management plan during construction and thereafter, as well as the following basic development design standards which must be met:
 - (a) The proposed development shall not decrease the factor of safety for landslide occurrences below the limits of 1.5 for static conditions and 1.2 for dynamic conditions. Analysis of dynamic conditions shall be based on

a minimum horizontal acceleration as established by the current version of the International Building Code;

Applicant response (Geotechnical engineer):

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- (b) The alteration will not increase the threat of the geological hazard to the project site or adjacent properties beyond predevelopment conditions, nor shall it result in a need for increased buffers on neighboring properties;

Applicant response (Geotechnical engineer):

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- (c) The development will not increase or concentrate surface water discharge or sedimentation to adjacent sites beyond predevelopment conditions;

Applicant response (Geotechnical engineer):

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- (d) Structures and improvements shall be located to minimize alterations to the natural contour of the slope and foundations shall be tiered where possible to conform to existing topography;

Applicant response (Geotechnical engineer):

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- (e) The use of engineered retaining walls that allow the maintenance of existing natural slope area is preferred over graded artificial slopes. Engineered retaining walls shall not exceed 15 feet in height and preferably should be less than eight feet in height. Riprap retaining walls should not exceed eight feet in height. Wherever possible, retaining walls should be designed as structural elements of the building foundation; and

Applicant response (Geotechnical engineer):

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- (f) Development shall be designed to minimize impervious lot coverage. Use of common access drives and utility corridors is encouraged.

Applicant response (Geotechnical engineer):

- Please delineate on the face of the plat drawing the areas meeting the 40% slope standard, apply the buffer (as stipulated in the report, page 5) and set these areas aside as protective ‘no-disturbance’ areas (in accordance with PMC 21.06.830) in accordance with the Geotech report recommendations.
 - The minimum buffer area shall be undisturbed natural vegetation consisting of trees and/or dense woody vegetation and have adequate drainage. To improve the functional attributes of the buffer, the director may require that the buffer be enhanced through planting to achieve a dense covering of woody vegetation such as trees and shrubs. The updated Geotech report makes reference to buffer areas, but they aren’t shown.
- Please provide a plan to access Tract A for maintenance purposes by the HOA. That access will not be able to be derived from Tract D, which is assumed be a public ownership parcel for the purposes of storm water. **Updated notes, January 2019: The 5’ pathway is not wide enough for maintenance access. If a tree needs to be removed or access to the wetland areas provided outside of simple walking access, at least 15’ needs to be provided.**
- The project applicant needs to submit a preliminary landscape plan. Plan shall address street trees, landscaping as required by PMC 19.12.070 (1) and landscaping near any buffers impacted by development, and critical area slopes, as described above. **Updated notes, January 2019:: Still needed.**
 - **Updated notes, January 2019: - Please acknowledge the following:** One off-site sidewalk connection has been identified; approximately 60’ of sidewalk is missing on the south side of 19th Ave SE, just west of the project boundary, located behind 1929 19th Ave Ct SE. This connection will be a required off-site improvement.

Standard DRT LETTER Condition (PMC 20.11.022 inactive applications):

1. Pursuant to PMC 20.11.022 regarding inactive applications, any and all pending land use applications or plat applications shall be deemed null and void unless a timely re-submittal is made to the City within 1 year of issuance of this Development Review Team (DRT) comment letter. Said DRT letter typically identifies requested corrections, studies or other additional required pieces of information necessary to demonstrate conformance with the City’s adopted development standards and codes. Subsequent applicant re-submittals shall make a good faith effort to respond to each request from this letter in order for the application to remain active. The failure to provide timely responses or lack of providing the requested material(s) within the 1 year window following DRT comment letter issuance shall be grounds for expiration, thus deeming the pending application null and void with or without a full or partial refund of application fees.

ENGINEERING –Alicia Floyd (253) 435-3637 afloyd@ci.puyallup.wa.us

- **Engineered plans must follow the latest regulations and standards set forth in the Puyallup Municipal Code (PMC) and the City Standards for Public Works Engineering**

and Construction (design standards) at the time of permit application. The stormwater design associated with this preliminary plat was reviewed for compliance with the 2014 amended Stormwater Management Manual for Western Washington (DOE manual), but is not vested to these stormwater regulations at this time. The comments provided below are project-specific in nature and should not be considered an exhaustive list of the requirements from the PMC, design standards, and DOE manual.

Staff has review the resubmittal for P-18-0040 Sunset Pointe Preliminary plat and have determined that the information presented is not adequate enough to complete a full review by staff. Please address the following critical items and resubmit to continue the review of this application:

1. It is unclear how increasing the slope of the landslide hazard area on lots 6 and 7 with 25 vertical feet of engineered fill “eliminates” the landslide hazard area. Further, the City’s critical area code clearly states that alteration of slopes greater than 40% is prohibited [PMC21.06.1230]. Based on the information provided, the landslide hazard area near lots 6 and 7 is nearly 60%.
2. The City will require the applicant to depict the toe of the slope on the Kodiak estates. If site access cannot be gained, Lidar contours may be used to supplement survey information. The critical area report must individually address performance standards from PMC 21.06.1230. As part of this, the geotechnical engineer must specifically address impacts to adjacent properties. Further, SEPA item B.10.b will be reviewed with regards to the total slope of 28ft +/- and its impact to the adjacent properties’ line of site from their backyard.
3. It is unclear why the SEPA checklist was revised to call the existing wetlands “manmade ornamental ponds”, however it has been clearly established that these “ponds” are considered wetlands and shall be regulated as such. Please remove all references to “manmade ornamental ponds” and replace with description for wetlands.
4. There doesn’t appear to be any analysis in the stormwater report or critical area report that addresses the analysis required for MR #8. Further, the stormwater report is still referring to these waterbodies as “manmade ponds” and not wetlands. Applicant must provide an analysis in accordance with Appendix I-D of the 2014 DOE manual.
5. Small-scale PIT tests and continuous seasonal high groundwater monitoring in accordance with the 2014 DOE manual will be required prior to approval of the preliminary plat. Please ensure that the tests are performed during the appropriate wet-weather season and that the number of tests complies with the DOE manual requirements. (The wet-weather season for PIT tests is December 1st – April 1st and the wet-weather season for groundwater monitoring is December 21st – March 21st.) This geotechnical testing is required by the State and the requirement cannot be waived by City staff.
6. The subdivision layout does not adhere to the City’s standards regarding panhandle lot access. Panhandles must be separated by at least one lot width. Lots 3, 4, and 5 are all considered panhandle lots.

7. Any dead-end road (public or private) over 150' in length must have provisions for a fire truck turnaround.

Previous DRT Comments:

Geotechnical/Critical Areas Assessment/Stormwater Report:

1. The geotechnical report prepared by Earth Solutions NW must be updated to reflect the current project design. Applicant will not be permitted to redirect surface water to neighboring adjacent properties at the Southern boundaries of lots 13, 14, 15, 16, 17, 7, and 8 as currently designed. The stormwater report must specifically address PMC 21.10.050 (3) with regards to surface water drainage from the proposed development posing "no significant adverse impact to the downhill property" . This condition does not appear to be currently met for lots 13, 14, 15, 16, 17, 7, and 8.
2. If retaining wall(s) are proposed for the steep slopes at the Eastern boundary of the site, the civil plan must depict wall footing drains that are directed onto the development property and not onto adjacent properties. Retaining walls, if proposed, must also comply with setback requirements set forth in PMC 20.58.005 (2)(a).
3. The geotechnical study does not include any infiltration testing to support its claim that infiltration is infeasible. In addition, other than the heavy perched groundwater seepage observed in TP-4, the report offers little discussion on the expected groundwater conditions. Evidence of iron oxide staining in many of the test pits along with Habitat Technologies' observation of "numerous groundwater seeps" and "fully saturated conditions" in their site reconnaissance suggests that there is more to elaborate on with regards to groundwater. Prior to preliminary plat approval, wet-weather infiltration and groundwater testing in accordance with the 2012 SWMMWW will be required to support stormwater feasibility/infeasibility.
4. The geotechnical study does not address the presence of wetlands and perennial streams on-site. Please include a brief description of these features and their impact on the site soils if applicable.
5. Please elaborate on the "moderate organic debris" found in TP-15 that was found to be deleterious.
6. The landslide hazard discussion for lots 12 and 13 appears to be commenting on the existing slope and not the proposed 2:1 20+ foot slope at the southern sides of lots 13, 14, 15, 16, 17, 7, and 8. Further, the discussion does not address the heavy perched groundwater found in TP-4 near proposed lot 14 or the presence of loose to medium dense soils on top of dense silts and the impact of the development on these soils. Applicant will not be permitted to increase the height and slope of the landslide hazard area as currently depicted.
7. The landslide hazard discussion for lot 8 must be updated to reflect the current proposed conditions for lots 7 and 8, which do not include an MSE wall as initially assumed by Earth Solutions NW.
8. According to SJC's 3rd party review the "ornamental ponds" must be regulated as wetlands. As such, the discharge from the proposed storm facility and lot 17 must be assessed against Minimum Requirement #8.
9. Compliance with MR #8 is not met by providing the critical area assessment alone. Applicant must provide an analysis of MR #8 in accordance with Appendix 1-D of the

2012 SWMMWW. Class IV wetlands are not required to strictly meet MR #8, but the analysis must still be presented to the City for review. The City will require a signed letter from a wetland biologist or hydrogeologist stating that the development poses no adverse impact to the wetlands' hydroperiods or ecosystems.

10. Please depict and describe the downstream drainage path for the water that is discharged to the "ponds". Provide a downstream summary/analysis for all outfall points.
11. Public ROW runoff must be treated and detained separately from private drainage facilities. This shall be accomplished by providing separate publicly maintained storm facilities within a tract or dedicated right-of-way; enlarging the private facilities to account for bypass runoff; or other methods as approved by the City Engineer.
12. Flow rates for the North and South basin do not match the WWHM output provided. Please reconcile.
13. The percent exceedance column provided is confusing/misleading because it is a positive percentage whether post development conditions exceeded or was less than pre-developed conditions. Additionally, it appears that several of the percentages are incorrect.

SEPA:

1. Item B.1.d must include a description of the landslide hazard areas present on-site.
2. Item B.3.1. must include a description of the perennial stream observed by Habitat Technologies. Also, please provide a brief description of the site wetlands as opposed to solely referring to the critical areas report.
3. Item B.3.2 provides no description or attached plans for the proposed work within the wetland buffer area.
4. The description provided for item B.7.a.(1) is incorrect. There is site history of a dam constructed from used car battery casings that was remediated. Please discuss this historic contamination in the SEPA report.
5. The height provided for item B.10.b. does not include the height of the slope for proposed lots 13, 14, 15, 16, 17, 7, and 8. Please include a description of the entire height of obstruction from the toe of the existing slope on the Kodiak estates properties to the assumed roof line of the proposed properties listed above. A simple sight diagram may be useful in illustrating this project's impact to the neighboring properties.

Preliminary Plat Comments (all comments apply to Sheet P2):

1. Depict and label the following existing easements:
 - a. 1071540
 - b. 1549950
 - c. 22510
 - d. 201710300359
 - e. 201710300360
2. Provide preliminary road profiles so that the proposed roads can be reviewed against vertical design criteria.
3. Show locations of proposed streetlights.
4. Provide contours a minimum of 20' beyond the property lines. Will be required to show the toe of the steep slope ending at Kodiak Estates.
5. Label existing culverts that are crossing from Pond A to Pond B.
6. Minimum easement width for a utility is 40 feet.

7. Please clarify what the 25' x 25' leased easement area is for and if it is still in use.
8. The City will allow some lateral connections into a manhole, however the 5 laterals entering the same manhole as currently shown is not constructible. Please revise.
9. Provide a dual water meter between lots 19 and 20 and between lots 21 and 22.
10. Lot 1 must have frontage on a public street.
11. Please clarify where the water meters for lots 1 and 3 will be located.
12. Lots 1 and 3 will not be permitted to share a sanitary lateral as currently depicted.

Fees:

- A water system development charge (SDC) will be assessed for each new single family residence and is due at the time of building permit issuance for the individual lot(s). The current amount of the SDC as of this writing is \$3,767.00. [PMC 14.02.040, 14.10.030]
- A sanitary sewer system development charge (SDC) will be assessed for each new single family residence and is due at the time of building permit issuance for the individual lot(s). The current amount of the SDC as of this writing is \$5,206.00 [PMC 14.10.010, 14.10.030]
- A Stormwater Systems Development Charge (SDC) will be assessed for each new single family residence. The current SDC as of this writing is \$3,146.00 per unit.
- For new plats, water and sewer connection fees and systems development charges for water, storm, and sewer will be assessed at the time of building permit issuance for the individual lots. [PMC 14.10.010, 14.10.030, 14.02.040]
- Civil engineering plan review fee is \$670.00 (plus an additional per hour rate of \$130.00 in excess of 5 hours). The Civil permit shall be \$300.00 and the inspection fee shall be 3% of the total cost of the project as calculated on the Engineering Division Cost Estimate form. [City of Puyallup Resolution No. 2098]

TRAFFIC – Bryan Roberts (253) 841-5542 broberts@ci.puyallup.wa.us

- ✓ Traffic scoping worksheet is approved. The traffic impact fee will be \$4,455 fee per dwelling unit and shall be paid prior to building permit issuance.
- ✓ Park impact fee was established by Ordinance 3142 dated July 3, 2017 and shall be charged per new dwelling unit based on its size:

Size of Residential Dwelling	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

- ✓ Per Puyallup Municipal Code Section 11.08.130, the applicant/owner would be expected to construct half-street improvements including curb, gutter, sidewalk, roadway base, pavement, and street lighting. Any existing improvements which are damaged now or during construction, or which do not meet current City Standards, shall be replaced. Based on the materials submitted, the applicant would be expected to construct half-street improvements on the following streets:
 - ✓ 23rd St PI SE shall consist of 28' streets with curb, gutter, 5' sidewalks, 5.5' planter strips, and street lights within a 50' right-of-way. The improvements shall be from

street centerline. Assuming a symmetrical cross section, additional right-of-way (ROW) may need to be dedicated to the city. NO Parking signs shall be required on at least one side of this road.

- ✓ A new city standard street light will be required at the tract entrance (intersection of 21st St SE & 19th Ave SE
- ✓ A separate street lighting plan is required for the City's review.

FIRE PREVENTION – David Drake (253) 841-4171 ddrake@ci.puyallup.wa.us /Ray Cockerham (253) 841-5585 rayc@ci.puyallup.wa.us

- Verify fire flow, a Water Availability/ Fire Flow report shall be required. **Provide letter.**
- City of Puyallup Municipal Code requires a minimum 1,000 GPM of fire flow. If this amount is less than the requirement, a fire sprinkler system shall be required in the new structures built in the plat. **Provide letter.**
- Per City of Puyallup Municipal Code 16.08.070 (14), Installation of fire hydrants. Any portion of new single-family dwellings shall be within 600' from a public hydrant that is located on a fire apparatus access road. **Provide clear representation where Fire Hydrants are located.**
- Fire Hydrants will be required per city standards and fire code. **Fire Hydrant will be required at the end of Track C to meet spacing requirements.**
- Driveways 150' and over will require a fire truck turn around. Lots 1,3,7, and 8 may require a turn around. **This does not meet fire department access. This will need to be demonstrated.**
- Maximum grade shall not exceed 10% for fire access roads.
- Does not meet city standards. Review is not complete.

BUILDING – Eric Belin (253) 770-3328 eric@ci.puyallup.wa.us

- Earth moving during the grading process will require a Geo Engineers report for Building Envelope soils compaction and bearing capacity.
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Please submit 6 copies of the requested information at your earliest convenience to continue the review process of your application; please fully respond in writing to the remaining items that need to be addressed, as outlined above. If you have questions regarding the requests, comments or conditions outlined above, please contact the appropriate staff member directly using the phone number and/or email provided.

Sincerely,



Chris Beale, AICP
Senior Planner