CITY OF PUYALLUP

Development Services Center
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www.cityofpuyallup.org

November 21, 2019

C.E.S NW, Inc.
ATTN: Craig Deaver
310 29th Street NE, Suite 101
Puyallup, Washington 98372

EMAIL: cdeaver@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 23RD 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

GENERAL OVERVIEW SUMMARY NOTES:

- 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.
- Please review pages 5-7 of the Earth Solutions NW for your project Geotech designation of those critical areas, and complete the following:
    - On the plat map, show the set aside steep slope areas by delineating them on the plat map
    - For areas over 40% slope, PMC 21.06.1240 (1)(a)(ii) states that buffer for those slope areas *are:*
        - *Equal to the height of the slope, or 25 feet, whichever is greater.*
            - *The buffer may be reduced by 25 percent when a qualified professional demonstrates to the director's satisfaction that the reduction will adequately protect the proposed development, adjacent areas, developments, uses, and the subject critical area, except:*
        - *The buffer shall never be less than 25 feet.*
    - 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.
- Areas of Tract A also appear to contain the 40% slope areas, consistent with these requirements, a buffer from those areas need to be shown. That buffer area can overlay onto properties with a 'Native Growth Protection Area' designation over them (as opposed to carving them out into a tract).
- A 35' Native Growth Protection Area (NGPA) buffer will be required on the rear of lots 9-13 and lot #8 to protect downslope neighbors from land modifications that could exacerbate:
    - downslope drainage
    - erosion
    - risk of slope/wall failure and,
    - loss of solar access as a result of the development of these lots.
        - If the slope area and buffer related to the 40%+ steep slopes lots 9, 10 is larger than the 35' NGPA buffer, the larger shall be shown on lots 9.,10 and shall govern.
- In a separate memo from your Geotech, please address the site development and the standards of PMC 21.06.1230 (2)(A)-(F)

- Lot #4 needs to share vehicular access with lot #1 via a shared private road tract. Sharing private driveway on the panhandle of lot #4 and 15' pedestrian access to tract A will cause confusion about use by the public as it will look and function like a private driveway.
- 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, November, 2019:: Still needed.**

✓ The 15' pathway easements shall be for the public to use.

✓ 15' public pedestrian pathway easements shall contain protective language to prevent future blockage or closure of those pedestrian pathways by the HOA or owners of lots. Alternatively, staff may require the pathway to be dedicated as city right of way. Staff has continually had issues with HOAs closing these easement-protected pathways and is presently considering a change to city policy to require they become city owned trails. TBD at the time of final plat dedication.

✓ The project Geotech report may be peer reviewed for further areas of possible impact, including drainage and site/lot grading feasibility, at the time of civil permitting. Further restrictions may apply to lot areas that may need to be reflected on the final plat.

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.

COMMENTS 11/2019:

Stormwater Report:

- Provide narrative description of existing site hydrology. The pre-developed basin map does not appropriately depict the direction that all the surface water drains in the existing conditions. Depict basins that are currently draining to adjacent properties.
- Based on the preliminary plans, it appears that lots 1, 4, 5, 6, 7, and 8 all intend to be dispersed to the wetlands however the report states that only lots 1, 4, 5, and 8 will be dispersed to the wetlands. Please clarify/ensure that the report, plans, and exhibits are coordinated with each other.
- Clarify how the roof runoff for lots 2 and 3 will be mitigated.
- Please note the following manual requirements for <u>full dispersion</u>:
    - Any areas used to meet the "65/10" rule for full dispersion must be in a dedicated tract or recorded easement.
    - Wetland areas and their buffers cannot be counted towards the 65% forest or native condition area.
    - Dispersion practices are not allowed in critical area buffers.
    - Dispersion practices are not permitted on slopes greater than 20%. Further, the slope of the flowpath must be no steeper than 15% for any 20-foot reach of the flowpath.
- Applicant must demonstrate compliance with Puyallup Municipal Code 21.06.940(1)(c)(i-vi) regarding permitted use of the wetland buffer. Further, applicant cannot encroach into the inner 75% of the wetland buffer. See planning requirements for further details.

<u>COMMENTS 02/2019</u>

- 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%.
    - **Applicant must demonstrate feasible grading scheme for lots that are impacted by the landslide hazard area in accordance with PMC 21.06.1230(8)(a) (copied below for your reference). Further, the limits of the landslide hazard area must be appropriately depicted on the plat.**

    PMC 21.06.1230(8) Subdivisions. The division of land in landslide and erosion hazard areas and associated buffers is subject to the following:

    Land that is located wholly within an erosion or landslide hazard area or its buffer may not be subdivided. Land that is located partially within an erosion or landslide hazard area or its buffer may be divided; provided, that each resulting lot has sufficient buildable area outside of, and will not affect, the erosion or landslide hazard or its buffer

- The City will require the applicant to depict the toe of the slope on the Kodiac 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.

- **Please provide additional contour information to clearly demonstrate that the toe of the slope is actually captured on the plans.**

- 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.
    - **There are still places in the SEPA document where the wetlands are called ponds. For clarity, revise the names of the wetlands from "ponds" A-C to "wetlands" A-C.**
- 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.
    - **An analysis in accordance with Appendix I-D of the manual was not provided in the 06/2019 submittal. See related comment below.**
- 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.
    - **Multiple PIT test locations and multiple continuous high groundwater monitoring locations performed during the appropriate wet-weather season will be required prior to preliminary plat approval.**

✓ 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.

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

  Not provided in 06/2019 submittal.

<u>COMMENTS 08/2018</u>

Geotechnical/Critical Areas Assessment/Stormwater Report:

- 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.

  The 06/2019 geotechnical report appears to have a different lot numbering than the civil plans. Please update so that both the plans and the report have the same lot numbering. Further, the body of the geotechnical report appears to be referencing a different lot numbering than the report exhibit (plate 2). Specifically, the updated

geotechnical report states that lots 9, 10, and 15 (based on plate 2 in the report) meet the landslide hazard criteria of having slopes greater than 40% with at least 10 feet of vertical relief, yet these lots do not appear to meet the criteria. Please verify.

Further, the applicant had not yet adequately demonstrated that surface water drainage from the eastern lots will not be increased with the proposed development. Demonstrating that the project as a whole meets MR #7 does not demonstrate that the site flows to the adjacent properties on the East side of the site will not increase.

✓ 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).

- 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.

As previously stated, multiple PIT test locations and multiple continuous high groundwater monitoring locations performed during the appropriate wet-weather season will be required prior to preliminary plat approval.

- 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.

Please include description of these features in the geotechnical report. Currently the report does not include a description of the ravine and perennial stream and still refers to the wetlands as ponds.

✓ Please elaborate on the "moderate organic debris" found in TP-15 that was found to be deleterious.

- 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.

See related comment about requirement to demonstrate feasible grading scheme for lots impacted by landslide hazard area and its buffer. Additionally, please elaborate on why the lots along the Eastern side of the site (lots 8-14, per the geotechnical report) do not meet the landslide hazard criteria of 21.06.1210(b)(ii).

✓ 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.

- According to SCJ'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.

Minimum Requirement #8 has not been adequately addressed with the 06/2019 submittal. See related comments below.

- 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.

As previously stated, applicant must prepare an analysis in accordance with Appendix I-D of the 2012 SWMMWW. This requires an analysis of the wetland's flow volume on both a monthly and daily basis. The provided analysis of the 2, 5, 10, 25, 50, and 100-year storm events is not appropriate for assessing the impact of the development to the wetlands' hydroperiods. Further, the project's biologist will have to specifically address the project's impact to the wetlands' ecosystems.

- 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.

Provide a survey of the features described in the downstream drainage paths (the French drain and 12" storm drainage system in 21st Ave for the Northern basin and the 12" storm drainage system leaving Pond C towards Kodiac Estates.

✓ 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.

- Flow rates for the North and South basin do not match the WWHM output provided. Please reconcile.

The stormwater report details, including the WWHM model, will not be re-reviewed until the comments related to the infiltration/groundwater testing have been resolved as these comments directly impact the stormwater analysis.

- 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.

The stormwater report details will not be re-reviewed until the comments related to the infiltration/groundwater testing have been resolved as these comments directly impact the stormwater analysis.

SEPA:

- Item B.1.d must include a description of the landslide hazard areas present on-site.

Please ensure that the lot numbers are coordinated appropriately between the geotechnical report, stormwater report, plan sheets, and SEPA checklist.

- 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.

Please ensure that all references to ponds are removed.

- Item B.3.2 provides no description or attached plans for the proposed work within the wetland buffer area.

Include a description for proposed dispersion BMPs in wetland buffers.

✓ 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.

- 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.

Include narrative/diagram of how lots at Kodiac Estates will be impacted with regards to SEPA item B.10.b. The SEPA checklist does not specify that this item is only relevant if the lots are considered to be in a prime view corridor. The impact of light blockage/increase to the slope should be considered in the response to this SEPA item.

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

✓ Depict and label the following existing easements:
  - 1071540
  - 1549950
  - 22510
  - 201710300359
  - 201710300360

✓ Provide preliminary road profiles so that the proposed roads can be reviewed against vertical design criteria.

✓ Show locations of proposed streetlights.

- 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.

  Please provide additional contour information to clearly demonstrate that the toe of the slope is actually captured on the plans.
- Label existing culverts that are crossing from Pond A to Pond B.

  Please include size of existing culverts connecting the wetlands.
- Minimum easement width for a utility is 40 feet.

  The proposed storm easement must be 40'.

✓ Please clarify what the 25' x 25' leased easement area is for and if it is still in use.
✓ 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.
✓ Provide a dual water meter between lots 19 and 20 and between lots 21 and 22.
✓ Lot 1 must have frontage on a public street.
✓ Please clarify where the water meters for lots 1 and 3 will be located.
✓ Lots 1 and 3 will not be permitted to share a sanitary lateral as currently depicted.

Fees:

- ***Please note that system development fees increase annually on February 1st.***

✓ 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 Pl 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.
- ✓ A separate street lighting plan is required for the City's civil review. Street lights will be required on 19th Ave SE & 23rd St Pl SE
- ✓ Offsite striping plan required to safely transition vehicles to/from widened sections on 19th Ave SE.
- ✓ At the intersection of 21st St SE & 19th Ave SE, the NE corner must be completely clear of sight obstructions. The City's Approach Sight Distance Standards 01.01.11 (85ft sight triangle) must be shown on civil plans.
- The Cul-de-sac on 19th Ave SE must meet minimum radius requirement per Fire requirements.
- ✓ NO Parking signs shall be required on one side of 19th Ave SE & 23rd St Pl SE.

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. Lot 8 will require a fire truck turn around, this driveway will be over 10%. How will this be addressed?
- Does not meet city standards. Review is not complete. "Knuckle" does not meet fire truck turning radiuses.

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

- Earth moving during the grading process will require a Geo Engineers report as part of the Final Plat Approval for Building Envelope soils compaction and bearing capacity.

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