



City of Puyallup

Planning Division

333 S. Meridian, Puyallup, WA 98371

(253) 864-4165

www.cityofpuyallup.org

CASCADE SHAW DEVELOPMENT
 PO BOX 1442
 GRAHAM, WA 98338-1442

DEVELOPMENT REVIEW TEAM (DRT) LETTER	
DRT #	I
PERMIT #	P-21-0142
PROJECT NAME	CASCADE SHAW SHORT PLAT
PERMIT TYPE	Short Plat
PROJECT DESCRIPTION	Two (2) lot short plat with lands covered by water.
SITE ADDRESS	808 SHAW RD, PUYALLUP, WA 98372;
PARCEL #	0420351003;
ASSOCIATED LAND USE PERMIT(S)	P-20-0086 L-20-0003 PL20220044
APPLICATION DATE	November 12, 2021
APPLICATION COMPLETE DATE	December 14, 2021
PROJECT STATUS	<u>Active Development Review Team (DRT) review case – resubmittal required.</u> 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 EXPIRATION CONDITIONS	N/A – Active permit application, not approved; Active permit application, not approved; 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. DRT review letters typically identify 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.

HOW TO USE THIS LETTER

This review letter includes two sections: “**Action Items**” and “**Conditions**”.

The “**Action Items**” section includes all items that the applicant must address to comply with the Puyallup Municipal Code (PMC) and city standards. Items listed in under **Action Items** require a resubmittal under this permit for further review by the Development Review Team (DRT); your application is not approved. Please make those updates to the proposed plans and resubmit for review. Please include a response letter outlining how you have revised your proposal to meet these items for ease of plan check by DRT members.

The “**Conditions**” are items that will govern the final permit submittal(s) for the project. Please be aware that these conditions will become conditions of the final permits and/or recommendations to the Hearing Examiner, if applicable.

If you have questions regarding the action items or conditions outlined in this letter, please contact the appropriate staff member directly using the phone number and/or email provided.

ACTION ITEMS

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

- A type II, 15-foot vegetative buffer shall apply to all arterial and collector roadways as designated in the comprehensive plan. Said buffers shall be placed in either a native vegetation protection easement (NVPE) or dedicated NVPE tract with appropriate protection language., Short Plat, Sheet 8 of 8
- Add cross walk over Deer Creek to sidewalk across the street, Short Plat, Sheet 4 of 8
- Street trees will be required back of walk wherever sidewalks are required, Short Plat, Sheet 4 of 8

Engineering Review - Mark Higginson; (253) 841-5559; MHigginson@PuyallupWA.gov

- In accordance with City codes and standards a proposed project must provide sufficient technical information to allow a finding that the proposed stormwater design is viable. The information contained in this storm report is insufficient for such a finding...see comments associated with Minimum Requirement 4, 7, and 8. In addition, the following specific comments outlined in the City's pre-application letter dated September 28, 2020 were not addressed:a) "The storm report indicates that a large portion of the site surface runoff is being redirected to discharge eastward into Shaw Road. However, Minimum Requirement 4 (MR4) requires the developed site to maintain existing drainage patterns and discharge at the natural location of the site. Based on the existing topographic contours, the natural discharge location for the parcel is at the NW corner of the project (not Shaw Road) which is also the Deer Creek stream corridor (a fish bearing water body). -Revise the preliminary stormwater design to comply with conditions described in MR4 or provide justification for releasing to Shaw Road. -Any documentation in support of changing the natural discharge location shall include appropriate environmental studies to ensure there are no adverse impacts to the stream corridor."b) "There are two Category IV wetlands on the existing parcel which do not appear to be addressed in the introductory storm report. At time of Preliminary Site Plan application, the applicant shall provide a preliminary analysis indicating that the proposed project will comply with Minimum Requirement 8 (MR8), Wetlands Protection."c) "The introductory storm report does not provide any information on how the project intends to comply with Minimum Requirement 7 (MR7), Flow Control. At the time of Preliminary Site Plan application, the applicant shall clarify the stormwater design approach and provide preliminary sizing calculations for any retention/detention facility(ies)." [Storm Report; Page 2]
- In accordance with City codes and standards a proposed project must provide sufficient technical information to allow a finding that the proposed stormwater design is viable. The information contained in this storm report is insufficient for such a finding...see comments associated with Minimum Requirement 4, 7, and 8. In addition, the following specific comments outlined in the City's pre-application letter dated September 28, 2020 were not addressed:
- a) "The storm report indicates that a large portion of the site surface runoff is being redirected to discharge eastward into Shaw Road. However, Minimum Requirement 4 (MR4) requires the developed site to maintain existing drainage patterns and discharge at the natural location of the site. Based on the existing topographic contours, the natural discharge location for the parcel is at the NW corner of the project (not Shaw Road) which is also the Deer Creek stream corridor (a fish bearing water body). -Revise the preliminary stormwater design to comply with conditions described in MR4 or provide justification for releasing to Shaw Road. -Any documentation in support of changing the natural discharge location shall include appropriate environmental studies to ensure there are no adverse impacts to the stream corridor."
- b) "There are two Category IV wetlands on the existing parcel which do not appear to be addressed in the introductory storm report. At time of Preliminary Site Plan application, the applicant shall provide a preliminary analysis indicating that the proposed project will comply with Minimum Requirement 8 (MR8), Wetlands Protection."

- c) "The introductory storm report does not provide any information on how the project intends to comply with Minimum Requirement 7 (MR7), Flow Control. At the time of Preliminary Site Plan application, the applicant shall clarify the stormwater design approach and provide preliminary sizing calculations for any retention/detention facility(ies)."
- [Storm Report; Page 2]
- Add comment about the site being previously filled under permit E19-0156. [Storm Report; Section 1.0]
- Runoff must be released at the site's natural discharge location per Minimum Requirement 4. Per the storm report associated with Permit E19-0156, runoff flows from the SE corner of the site to the NW corner via sheet flow and an interceptor ditch along the north property line. [Storm Report; Section 1.0]
- Please include flow chart in this report. [Storm Report; Section 2.0]
- Revise...the predeveloped condition prior to recent fill activity was from east-to-west and must be maintained per MR4. If a portion of the site, prior to fill placement, actually discharged to the east, then the site should be analyzed as a split basin. [Storm Report; Section 2.0]
- There are two wetlands on the property which must be protected per Min. Reqt 8. Prior to short plat approval, provide commentary and supporting calculations on how this will be accomplished. [Storm Report; Section 2.0]
- a) Revise per MR4 comments and the fact that the site discharges to a regulated stream and regulated wetlands. b) Clarify if any runoff from upstream (south) properties. c) At time of civil application, provide a more thorough analysis per City Std 201.2(2). [Storm Report; Section 3.0]
- Onsite Flow Control facilities req'd. [Storm Report; Section 2.0]
- See Min. Reqt 4 comments. [Storm Report; Section 2.0]
- This Master Plan indicates fill being placed within the regulated floodplain. Any development activity in the designated floodplain, including the placement of fill, shall comply with PMC 21.07 Flood Damage Protection, particularly the compensatory storage provisions. Quantify the amount of fill to be placed in the floodplain and identify the compensatory storage area, volume, and location. If the compensatory storage area is within the limits of the existing parcel, identify on the short plat document. If the compensatory storage area is outside the existing parcel, identify the parcel as well as the property owner, and record an easement or other document subject to City Attorney approval which will preserve the compensatory storage area in perpetuity. [Storm Report; Appendix A]
- These calculations only indicate undetained discharge to the offsite downstream system. Provide preliminary stormwater calculations that comply with MR7 and MR8 that would support a finding that the proposed stormwater design is viable and complies with the Ecology Manual.. [Storm Report; Appendix B]
- In accordance with City codes and standards a proposed project must provide sufficient technical information to allow a finding that the proposed stormwater design is viable. The information contained in this storm report is insufficient for such a finding...see comments associated with Minimum Requirement 4, 7, and 8. In addition, the following specific comments outlined in the City's Pre-Application letter dated September 28, 2020 were not addressed:
 - Add Application Number to Document (P-21-0142). [Plans; Sheet 1]
 - Typo [Plans; Sheet 1]
 - Replace with City Note 6 (or similar) to avoid having to record the Facilities Agreement prior to Short Plat approval. [Plans; Sheet 1]
 - Typo [Plans; Sheet 1]
 - Addressing shall be provided by EngineeringServices prior to short plat approval. [Plans; Sheet 1]
 - Add Application Number to Document (P-21-0142). [Plans; Sheet 2]
 - Reference this item on the Short Plat document. [Plans; Sheet 2]

- 1. No Building Permits will be issued for Lot 1 or Lot 2 until utility and road improvements to include curb, gutter, sidewalk, roadway base, pavement, water, sanitary sewer, storm infrastructure and street lighting are approved and permitted by Development Services Engineering for all street frontages.
- 3. Portions of the site are located within a Special Flood Hazard Area as determined by the National Flood Insurance Program Community Panel Number 53053C0342E, dated March 7, 2017 and subsequent LOMR 18-10-0841P dated April 4, 2019. Development of the property shall adhere to the City's Floodplain Management Regulations contained in PMC Chapter 21.07.
- 4. A preliminary storm drainage plan is on file for this short plat. No Building Permits will be issued for any lots of this short plat until a permanent storm drainage plan is approved and permitted by Development Services Engineering.
- 2. Occupancy for Lot 1 or Lot 2 will not be approved until such time as the required utility and road improvements are constructed by the property owner and accepted by the City.
- 5. The owner of Lots 1 through 2 shall record a Stormwater Management & BMP Facilities Agreement, on a form provided by the City, prior to final building permit approval and/or Occupancy.
- 6. NOTICE: This short plat will contain a private storm drainage system. Private storm drainage systems are the sole responsibility of the owners, successors, and assignees for all lots being served by the private storm drainage system. Responsibility includes, but is not limited to, constructing, maintaining, repairing, and allowing City inspection of the private storm system in accordance with a separate recorded stormwater management facilities agreement to be filed with the Pierce County Auditor.
- 7. No permanent structures(s) shall be erected within any public easement area(s). Permanent structure(s) shall mean any concrete foundation, concrete slab, wall, rockery, pond, stream, building, deck, overhanging structure, fill material, tree, recreational sport court, carport, shed, private utility, fence, or other site improvement that restricts or unreasonably interferes with the need to access or construct utilities in said easements(s). Permanent structure(s) shall not mean improvements such as flowers, ground cover and shrubs less than 3-feet in height, lawn grass, asphalt paving, gravel, or other similar site improvements that do not prevent the access of men, material, and machinery across, along, and within the said easement area. Land restoration within the said easement area due to construction, shall mean planting grass seed or grass sod, asphalt paving, or gravel unless otherwise determined by the City of Puyallup.8. This property is subject to Gravity Sewer Latecomer fee to be paid prior to building permit issuance for either Lot 1 or Lot 2. Reference AFN 2021107061306.
- 1. No Building Permits will be issued for Lot 1 or Lot 2 until utility and road improvements to include curb, gutter, sidewalk, roadway base, pavement, water, sanitary sewer, storm infrastructure and street lighting are approved and permitted by Development Services Engineering for all street frontages.
- Indicate Private Street Maintenance Agreement AFN 201911270861 [Plans; Sheet 3]
- Add Application Number to Document (P-21-0142). [Plans; Sheet 8]
- Add: "AFN 9601180513" [Plans; Sheet 3]
- 201210305003 [Plans; Sheet 3]
- Add:AFN 200409085002 [Plans; Sheet 3]
- Add Application Number to Document (P-21-0142). [Plans; Sheet 4]
- Revise to "Regulated Stream" [Plans; Sheet 4]
- Revise to "Regulated Stream" [Plans; Sheet 4]
- Revise to "Regulated Stream" [Plans; Sheet 4]
- Add Application Number to Document (P-21-0142). [Plans; Sheet 5]
- Identify ROW [Plans; Sheet 5]
- Identify Property Line [Plans; Sheet 5]
- Franklin Puyallup, LLC per AFN 201705300235 [Plans; Sheet 5]
- Callout bearings and distances associated with easement area. [Plans; Sheet 6]
- Add Application Number to Document (P-21-0142). [Plans; Sheet 6]
- Identify ROW [Plans; Sheet 6]

- Identify Property Line [Plans; Sheet 6]
- Add Application Number to Document (P-21-0142). [Plans; Sheet 7]
- Identify ROW [Plans; Sheet 7]
- Identify Property Line [Plans; Sheet 7]
- Add Application Number to Document (P-21-0142). [Plans; Sheet 8]
- Callout 10-ft ROW dedication [Plans; Sheet 8]
- 201210305003 [Plans; Sheet 8]
- Add: "AFN 9601180513" [Plans; Sheet 8]
- Add:AFN 200409085002 [Plans; Sheet 8]
- Verify Callout...S01d06'52"W? [Plans; Sheet 8]
- Min. Reqt 8 applies. [Plans; Sheet 8]
- Min. Reqt 8 applies. [Plans; Sheet 8]
- The Master Plan shown in Appendix A of the preliminary storm report indicates fill being placed within the regulated floodplain. Any development activity in the designated floodplain, including the placement of fill, shall comply with PMC 21.07 Flood Damage Protection, particularly the compensatory storage provisions. Quantify the amount of fill to be placed in the floodplain and identify the compensatory storage area, volume, and location. If the compensatory storage area is within the limits of the existing parcel, identify on the short plat document. If the compensatory storage area is outside the existing parcel, identify the parcel as well as the property owner, and record an easement or other document subject to City Attorney approval which will preserve the compensatory storage area in perpetuity. [Plans; Sheet 8]
- 2. Occupancy for Lot 1 or Lot 2 will not be approved until such time as the required utility and road improvements are constructed by the property owner and accepted by the City.
- 3. Portions of the site are located within a Special Flood Hazard Area as determined by the National Flood Insurance Program Community Panel Number 53053C0342E, dated March 7, 2017 and subsequent LOMR 18-10-0841P dated April 4, 2019. Development of the property shall adhere to the City's Floodplain Management Regulations contained in PMC Chapter 21.07.
- 4. A preliminary storm drainage plan is on file for this short plat. No Building Permits will be issued for any lots of this short plat until a permanent storm drainage plan is approved and permitted by Development Services Engineering.
- 5. The owner of Lots 1 through 2 shall record a Stormwater Management & BMP Facilities Agreement, on a form provided by the City, prior to final building permit approval and/or Occupancy.
- 6. NOTICE: This short plat will contain a private storm drainage system. Private storm drainage systems are the sole responsibility of the owners, successors, and assignees for all lots being served by the private storm drainage system. Responsibility includes, but is not limited to, constructing, maintaining, repairing, and allowing City inspection of the private storm system in accordance with a separate recorded stormwater management facilities agreement to be filed with the Pierce County Auditor.
- 7. No permanent structures(s) shall be erected within any public easement area(s). Permanent structure(s) shall mean any concrete foundation, concrete slab, wall, rockery, pond, stream, building, deck, overhanging structure, fill material, tree, recreational sport court, carport, shed, private utility, fence, or other site improvement that restricts or unreasonably interferes with the need to access or construct utilities in said easements(s). Permanent structure(s) shall not mean improvements such as flowers, ground cover and shrubs less than 3-feet in height, lawn grass, asphalt paving, gravel, or other similar site improvements that do not prevent the access of men, material, and machinery across, along, and within the said easement area. Land restoration within the said easement area due to construction, shall mean planting grass seed or grass sod, asphalt paving, or gravel unless otherwise determined by the City of Puyallup.
- 8. This property is subject to Gravity Sewer Latecomer fee to be paid prior to building permit issuance for either Lot 1 or Lot 2. Reference AFN 2021107061306. [Plans; Sheet 2]

- a) "The storm report indicates that a large portion of the site surface runoff is being redirected to discharge eastward into Shaw Road. However, Minimum Requirement 4 (MR4) requires the developed site to maintain existing drainage patterns and discharge at the natural location of the site. Based on the existing topographic contours, the natural discharge location for the parcel is at the NW corner of the project (not Shaw Road) which is also the Deer Creek stream corridor (a fish bearing water body). -Revise the preliminary stormwater design to comply with conditions described in MR4 or provide justification for releasing to Shaw Road. -Any documentation in support of changing the natural discharge location shall include appropriate environmental studies to ensure there are no adverse impacts to the stream corridor."
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- c) "The introductory storm report does not provide any information on how the project intends to comply with Minimum Requirement 7 (MR7), Flow Control. At the time of Preliminary Site Plan application, the applicant shall clarify the stormwater design approach and provide preliminary sizing calculations for any retention/detention facility(ies)." [Storm Report; Page 2]

Traffic Review - Bryan Roberts; (253) 841-5542; broberts@PuyallupWA.gov

- If no access easement required along lot 1 & 2 frontage. 253.76ft
- Existing roundabout may require pedestrian improvements that may require larger easement
- City may require applicant to pursue pedestrian access to Pioneer Crossing. Peds are unlikely to walk all the way to the existing Shaw Rd traffic signal to enter the adjacent development.
- City may require applicant to provide on-site pedestrian access to 25th St SE. This may also include pedestrian improvements on 25th St SE.
- ROW dedication on 25th St SE

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

- Street Trees. In order to further implementation of the city's street tree program, street trees are required to be installed in all plats in accordance with Chapter 11.28 PMC, Street Trees. Proposed subdivisions under this title shall dedicate suitable area for street trees in accordance with city standards for the applicable roadway.

- The following critical area notes need to be included on the face of the plat document: Lot 2 contains wetland areas and protective wetland buffers. A note shall be included on the face of the plat for each affected lot indicating: “This lot contains a wetland and/or wetland buffer that is protected by federal, state and local regulations. A wetland is a permanently, semi-permanently, or seasonally flooded area of land with a distinct ecosystem based on hydrology, hydric soils, and vegetation adapted for life in water saturated soils. Wetlands provide numerous benefits to the natural environment including water quality, flood control, wildlife habitat, shoreline stability, and aesthetic values. Since the 1780s, Washington has lost 31 percent of its wetland areas, from 1.35 million acres to 938,000 acres, contributing to loss of flood storage and habitat areas. Wetlands are critical to the overall health of watersheds and property owners are key for protecting, restoring, and managing our state's remaining wetland resources. Modification of land or vegetation and/or encroachment/conversion of these areas is strictly prohibited without prior government approval.”

Lot 2 contains a fish and wildlife conservation area. A note shall be included on the face of the plat for each affected lot indicating: “This lot contains a fish and wildlife habitat area that is protected by federal, state and local regulations. These areas serve a critical role in sustaining needed habitats and species for the functional integrity of the ecosystem, and which, if altered, may reduce the likelihood that the species will persist over the long term. Property owners are key for protecting, restoring, and managing our state's remaining habitat areas. Modification of land or vegetation and/or encroachment/conversion of these areas is strictly prohibited without prior government approval.”

Lot 2 contains a 100-year floodplain areas. A note shall be included on the face of the plat for each affected lot indicating: “This lot contains a 100-year floodplain areas, containing a 1% chance every year of flooding/inundation that could affect life, property, structures and improvements. All development and land modifications of floodplain areas requires city approval and consistency with the National Flood Insurance Program (NFIP), the Endangered Species Act (ESA), critical areas ordinance (PMC 21.06) and flood protection ordinance (PMC 21.07), as well as any other applicable state, federal and local laws. Modification of land or vegetation, especially land filling that could reduce flood storage capacity, and/or encroachment/conversion of these areas is strictly prohibited without prior government approval.”

Lots 1 and 2 contain critical aquifer recharge areas. A critical aquifer recharge area note for each affected lot shall indicate: “The site is within a high susceptibility/critical aquifer recharge area. Uses and activities on this site shall comply with the city’s critical area ordinance (Puyallup Municipal Code 21.06, Article XI). Activities that do not cause degradation of ground water quality and will not adversely affect the recharging of the aquifer may be permitted in a critical aquifer recharge area and do not require preparation of a critical area report; provided, that they comply with the city storm water management regulations and other applicable local, state and federal regulations.”

Lots 1 and 2 contain a volcanic hazard area. A volcanic hazard area note for each lot affected shall indicate: “The site is within a volcanic hazard area. In the event of an eruption of Mt. Rainier, the site is expected to be inundated by pyroclastic flows, lava flows, debris avalanche, inundation by debris flows, lahars, mudflows, or related flooding resulting from volcanic activities. Uses and activities on this site shall comply with the city’s critical area ordinance (Puyallup Municipal Code 21.06, Article XII, section 21.06.1260, or succeeding section, regarding volcanic hazard areas.”

- **Vegetation buffers:** a type II, 15-foot vegetative buffer shall apply to all arterial and collector roadways as designated in the comprehensive plan. Both Shaw Rd and 25th St SE meet this criteria, however since 25th St SE already includes a stream buffer, the 15-foot vegetative buffer will only be required at the Shaw road frontage. Buffers along city roadways shall include clumps of evergreen and deciduous trees intermixed with shrubs and no more than 25 percent turf grass;
When suitable natural vegetation is present, it shall be retained, and if necessary, enhanced with native plant material. Any proposed enhancement shall be set forth in a landscape plan, approved by the development services director or designee, and the landscaping installed prior to final plat approval;
and
When suitable natural vegetation is not present, a landscape plan shall be prepared reflecting the use of native plant material, approved by the development services director or designee, and the landscaping installed prior to final plat approval. All native vegetation buffers shall be placed into either a native vegetation protection easement (NVPE) or dedicated NVPE tract with appropriate protection language, as approved by the director or designee, shown on the face of the plat.
- **Critical Area Tract:** Deer creek and associated buffer; wetlands and associated buffer shall each be placed in separate "native growth protection area" tracts. Critical area tracts shall be designated as native growth protection areas and shall be recorded on all documents of title of record for all affected lots. Critical area tracts shall be designated on the face of the plat or recorded drawing in a format approved by the city attorney. The designation shall include the following restrictions:
 - An assurance that native vegetation within the growth protection area will be preserved;
 - The right of the city to enforce the terms of the restriction; and
 - The city will require that that the critical area tract be dedicated to the city, which assures the ownership, maintenance, and protection of the tract in accordance with PMC 19.12.070(4).
- Short plat document contains too many extraneous sheets and details for final recorded document. Reduce pages and details to only those items listed in Puyallup Municipal Code 19.02.100(2). Engineering details
- **Public pedestrian access:** A 15' wide public ROW access shall be provided connecting Shaw Rd with 25th ST SE. This 15' wide access shall be improved as a public pedestrian route.
- The City is interested in acquiring all the property on this parcel that is located in the 1% annual chance flood hazard mapped floodplain area. Please indicate if you are interested in donating this area to the City. If you are interested in donating this property to the City, please contact Paul Marrinan, Civil Engineer, at 253-841-5498 or PMarrinan@puyallupwa.gov
- **Floodplain Habitat Assessment:** Critical area report does not include analysis of floodplain impacts or FEMA habitat assessment criteria

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

- Changes to wetland report required. See Critical Area Review Letter I for list of required changes.
- See comment letters on SEPA noticing from Dept. of Ecology and Nisqually Tribe in document cache.

CONDITIONS

Development & Permitting Services - David Drake; 2538644171; DDrake@PuyallupWA.gov

- **General:** Comply with 2018 IFC
Comply with C.O.P. Engineering codes and standards

Engineering Division - Mark Higginson; 2538415559; MHigginson@PuyallupWA.gov

- **Standard Conditions:** See previous engineering comments contained in the City's response letter, dated September 28, 2020, associated with Pre-Application P-20-0086 for other conditions applicable to the proposed project.

Sincerely,
Rachael N. Brown

Associate Planner
(253) 770-3363
RNBrown@PuyallupWA.gov