

September 12, 2022

Nabila Comstock, Assistant Planner  
City of Puyallup  
Planning Division  
333 S. Meridian  
Puyallup, WA 98371

RE: Responses to Short Plat Letter Comments for Mullan Short Plat  
808 14<sup>th</sup> Street SW, Puyallup, WA 98371  
City of Puyallup Permit No. PLSHP20220003  
Our Job No. 22001

Dear Nabila:

We have revised the plans and technical documents for the above-referenced project in accordance with your comment letter dated July 19, 2022. Enclosed are the following documents for your review and approval:

1. Short Plat Map dated August 22, 2022
2. Site Plan, Grading and Utility Plan, dated September 12, 2022
3. Preliminary Stormwater Site Plan dated September 12, 2022
4. Groundwater Monitoring Program and Infiltration BMP Feasibility Report prepared by Earth Solutions NW dated April 25, 2022
5. Revised Critical Areas & Habitat Assessment prepared by Habitat Technologies dated 08/29/2022 (note the hydrology monitoring data is now Appendix B, not a separate document)

The following outline provides each of your comments in italics exactly as written, along with a narrative response describing how each comment was addressed:

**Planning Review** – *Nabila Comstock; (253) 770-3361; NComstock@PuyallupWA.gov*

- *Prior to submittal to the city for final signatures, please add a 'Critical Area' note to denote the presence of a 'CRITICAL AREA ON SITE' on the face of the short plat (sheet 1).*

**Response:** This note has been added to the Short Plat Map.

***Aquifer Recharge Area***

*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.”*

**Response:** This note has been added to the Short Plat Map.

**Volcanic Hazard Area**

*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, correlated 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.”*

**Response:** This note has been added to the Short Plat Map.

**Floodplain**

*Lot 1 and 2 contain 100-year floodplain areas. A note shall be included on the face of the plat for each affected lot indicating: “This lot contains 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 flood plain 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 reduce flood storage capacity, and/or encroachment/conversion of these areas is strictly prohibited without prior government approval.”*

**Response:** This note has been added to the Short Plat Map.

**Wetland**

*Lots 1 and 2 contain 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.”*

*[short plat preliminary site plan, pg. 1]*

**Response:** As described in the Revised Critical Areas Assessment prepared by Habitat Technologies dated 08/29/2022, there are no wetlands present on the project site.

- *Native Vegetation Protection Easement Areas (PMC 19.12.70)*  
*14th ST SW is designated as a minor collector roadway according to the city's comprehensive plan. Per PMC 19.12.070(a), a 15-foot vegetative buffer required along collector roadways. As a result, a 15-foot buffer area is required along the frontage of Lot 1.*
  - *The buffer area shall be placed into a "Native Vegetation Protection Easement (NVPE)" shown on the short plat drawing. The following note must also be added to the face of the short plat (sheet 1):*  
*"A 15-foot 'Native Vegetation Protection Easement (NVPE)' area is required along the frontage of Lot 1. The NPVE is meant to promote the visual quality of the streetscapes and provide additional buffering from major street corridors. A landscape plan meeting city standard shall be provided by the applicant and the following shall be required: - The NPVE shall be preserved in accordance with a final landscape plan and shall not be modified, disturbed or otherwise displaced without prior approval from the city's Planning Department; and -It is the right of the city to enforce the terms of the restriction in the easement area."*

*[short plat preliminary site plan, pg. 1]*

**Response:** The required 15-foot Native Vegetation Protection Easement and the associated note described above is shown on the Short Plat Map.

- *Please see the memorandums from Confluence Environmental Company who have conducted a third-party review of the October 2021 Critical Areas Assessment – Biological Evaluation letter by Habitat Technologies as well as a review of the June 2022 Spring Hydrology Monitoring letter by Habitat Technologies.*

**Response:** The Revised Critical Areas Assessment dated 08/29/2022 addresses the comments received by Confluence Environmental Company.

- *Please have Habitat Technologies address the recommendations made by Confluence in an updated habitat assessment report/hydrology monitoring study letter.*

**Response:** The Revised Critical Areas Assessment dated 08/29/2022 addresses the comments received by Confluence Environmental Company.

- *Please have Barghausen address the recommendations made by Confluence in an updated Storm Water Site Plan. The Storm Water Site Plan did not discuss the amount of floodplain fill associated with the project or the quantity and location of floodplain storage created by the project. Report should be updated to fully address the code requirements. [short plat preliminary site plan, pg. 1]*

**Response:** Section 5.2 of the Stormwater Site Plan included in this submittal has been revised to discuss the floodplain fill associated with this project and the quantity and location of the compensatory storage area provided to mitigate the floodplain fill.

- *Please submit the proposed short plat along with the completed City of Puyallup Short Plat template linked below: <http://www.cityofpuyallup.org/DocumentCenter/View/13810/Short-Plat-Cover-Page-Tempalte-2021-?bidId+>*

*[short plat preliminary site plan, pg. 1]*

**Response:** The Short Plat Map in the City of Puyallup template is included in this submittal.

- *Add the name and address of the owners to the face of the plat (sheet 1) (PMC 19.02.100 (a)).*

**Response:** This information is included in the Short Plat Map.

- *Provide the legal description of the existing and proposed lots (PMC 19.02.100 (b)).*

**Response:** This information is included in the Short Plat Map.

- *Provide the parcel number for the existing parcel at 808 14th St SW (PMC 19.02.100 (c)).*

**Response:** This information is included in the Short Plat Map.

- *Delineate the existing lot lines using a heavy dashed line, and the proposed lot lines shown using a heavy solid line (PMC 19.02.100 (g)).*

**Response:** The existing and proposed lot lines are shown as requested in the Short Plat Map.

- *Move the square footage of proposed Lot 1 to be outside the approximate building outline of the future SFR (PMC 19.02.100 (h, k)).*

**Response:** The square footage of Lot 1 has been moved to be outside the building outline of the single-family residence on the Site Plan.

- *Include the accurate location and dimensions/square footage of all existing and proposed structures, septic systems and utility services, and the distance between structures, improvements, and utilities to the adjoining proposed lot lines (PMC 19.02.100 (l)).*

**Response:** The accurate locations of existing buildings, utilities and driveways with dimensions and square footage of existing buildings is shown on the Short Plat Map.

- *Include contour lines to address the topography on the low by showing existing and proposed contours at five-foot contour intervals except for any portion of the site containing slopes of 15 percent or greater which shall be shown at two-foot contour intervals. The contour intervals shall extend at least 100 feet beyond the boundaries of the site (PMC 19.02.100 (m)).*

**Response:** Contour lines showing existing topography have been added to the Short Plat Map.

- *Update the site plan to delineate the boundaries and associated buffers, development envelopes, or other information for any critical areas as defined or required by Chapter 21.06 PMC (PMC 19.02.100 (o)).*

*[short plat preliminary site plan, pg. 1]*

**Response:** As described in the Revised Critical Areas Assessment prepared by Habitat Technologies dated 08/29/2022, there are no wetlands present on the project site therefore no

wetland information is shown on the Preliminary Site Plan. Information pertaining to the floodplain on-site is shown on the Site Plan and Grading and Utility Plan.

- *Update the site plan to include additional wetland critical areas and their buffers as appropriate (Confluence Third-Party Review of Critical Areas Assessment, pg. 4)*

**Response:** As described in the Revised Critical Areas Assessment prepared by Habitat Technologies dated 08/29/2022, there are no wetlands present on the project site, therefore no wetland information is shown on the Site Plan.

- *Update the site plan accordingly to address floodplain storage concerns (Confluence Third-Party Review of Critical Areas Assessment, pg. 6) [short plat preliminary site plan, pg. 1]*

**Response:** The Preliminary Grading and Utility Plan has been revised to discuss the floodplain fill associated with this project. Locations and quantities of the floodplain fill and compensatory storage area are now shown on this plan sheet.

- *On the CityView Portal, please view the following comment letters under documents & images:*
  - *Confluence Environmental Company*
  - *Department of Ecology*
  - *Nisqually Indian Tribe*
  - *Tacoma Pierce County Health Department*
  - *Squaxin Island Tribe*
  - *Pierce County*

**Response:** Each comment letter is addressed below.

Confluence Environmental Company: Comments from Confluence are addressed in the revised Critical Area & Habitat Assessment report which now includes the requested rating forms in Appendix A and the Hydrology Monitoring information as Appendix B, rather than as a separate document. Further, floodplain fill and compensatory storage are shown on the preliminary grading and utility plan sheet.

Department of Ecology: Noted, these are standard comments that will be addressed as part of the permitting process.

Nisqually Indian Tribe: The Nisqually Indian Tribe had no specific concerns

Tacoma Pierce County Health Department: TPCHD had no specific concerns

Squaxin Island Tribe: Squaxin had no specific concerns, noted that they would support a cultural assessment if DAHP recommended one. There is no recommendation from DAHP and online sources managed by DAHP show the site as a low probability site. Research as described in the SEPA checklist and following inadvertent discovery protocols appears to be sufficient in this case.

Pierce County: Noted, we are permitting this project with the City of Puyallup and have demonstrated that there is no adverse impact to flood hazard areas.

**Fire Review** – David Drake; (253) 864-4171; [DDrake@PuyallupWA.gov](mailto:DDrake@PuyallupWA.gov)

- *Incomplete Resubmittal - Please respond to all comments.*
  1. *Boundary Line may need to move North.*

**Response:** The current location of the proposed lot line has been approved by the City.

2. *3' required from property line to driveway that runs to future shop.*

**Response:** The 3 feet of space between the proposed lot line and the 12-foot driveway on Lot 1 is not required because an inverse crown will be provided within the driveway to collect stormwater runoff. This design has been approved by the City through correspondence during this review.

3. *20' driveway is our standard, 15' paved with 2-1/2' gravel shoulders.*

**Response:** The 22-foot shared access driveway shown on the Site Plan and Grading and Utility Plan has been approved by the City through correspondence during this review. The shared access driveway will be contained within a fire truck access easement shown on the Site Plan and the Short Plat Map. As noted in the next comment, the 12-foot driveway accessing the shop on Lot 1 is allowed provided the shop is not an ADU.

*"NOTE" Future shop would not be allowed to be an ADU unless driveway width and a fire truck turn-around are in compliance.*

**Response:** A note stating this requirement has been added to the Site Plan and Grading and Utility Plan.

**Engineering Review** – Anthony Hulse; (253) 841-5553; [AHulse@PuyallupWA.gov](mailto:AHulse@PuyallupWA.gov)

- *The proposed short plat must be a surveyed plan on City of Puyallup Short plat template found here: <https://www.cityofpuyallup.org/DocumentCenter/View/13810/Short-Plat-Cover-Page-Template-2021-?bidId=Note> that the survey map submitted has provided a good chunk of the required information outline in the short plat application. [short plat, pg. 1]*

**Response:** The Short Plat Map in the City of Puyallup template is included in this submittal.

- *Provide a legend showing existing/proposed lot lines. The existing lot lines shall be shown using a heavy dashed line, whereas the proposed lines shall be a heavy solid line. [short plat, pg. 1]*

**Response:** A legend showing the existing and proposed lot lines with the requested line types is included in the Short Plat Map.

Not added to plans

- *Provide owner's names as shown on the Title Report: Kristian J. Mullan and Joann C. Mullan. [short plat, pg. 1]*

**Response:** This information is included in the Short Plat Map.

- *Include the boundary and topographic survey as part of the short plat document. [short plat, pg. 1]*

**Response:** This information is included in the Short Plat Map.

- *Provide a section discussing the following: How will the project deal with Lawn and Landscaped areas? Soil amendment. The proposed SFR and future shop may not just connect into the city storm system without evaluating List #2. If all BMPs are infeasible, the project may connect into the city storm system. prelim drainage report, pg. 31*

**Response:** The Stormwater Site Plan has been revised to note that the Post Construction Soil Amendment BMP shall be applied to all disturbed lawn and landscape areas. The report has also been revised to include the feasibility discussion of all BMP's within List #2 and the BMP's applied to applicable target surfaces.

- *Provide a calculation for the amount of fill proposed for the project and how the project will provide compensatory storage at equivalent elevations to that displaced. [short plat, pg. 1]*

**Response:** The Stormwater Site Plan and Grading and Utility Plan have been revised to discuss the floodplain fill associated with this project and the quantity and location of the compensatory storage area provided to mitigate the floodplain fill.

- *Provide existing and proposed areas for new, plus replaced hard surfaces. [short plat, pg. 1]*

**Response:** This data has been added to the Site Plan and Grading and Utility Plan.

- *Include the updated Geotech report with groundwater monitoring information so the preliminary stormwater design can be determined. At this time, I can't determine if the flow control requirement is met or not. Provide an in-depth breakdown of surfaces that can be modeled as pervious if infiltrated or dispersed per the Ecology manual. [short plat, pg. 1]*

**Response:** The Groundwater Monitoring Program and Infiltration BMP Feasibility Report prepared by Earth Solutions NW is included in this submittal. Section 5.2 of the Stormwater Site Plan has been revised to provide an accurate breakdown of the new impervious and pervious surfaces. This breakdown includes discussion of certain impervious surfaces that were modeled as pervious due to the application of Flow Dispersion BMP's.

- *The WWHM calculation on page 36 speaks to a bypass basin. Show this on the basin map. [prelim drainage plan, pg. 27]*

**Response:** The "Bypass Basin" label on the WWHM calculations was miss-labeled and has been fixed in the revised calculations. The basin analyzed in the WWHM calculations is the On-Site Developed Basin and has been labeled as such.

- *There are future plans for a shared driveway, single family home, carport, shed, etc. Fill out question 7. [SEPA, pg. 3]*

**Response:** The work proposed for the shared driveway, single family home, carport and shed are described on SEPA page 2 #6 as the building permit and site development permits and on

SEPA page 3 #11 describing driveway access to each lot. As stated in the checklist, #11 can be modified by the lead agency as needed to include specific information needed. For the purpose of the SEPA determination the work for the building permit and site development is in the project scope and is not future. Those applications will follow the short plat approval. There are no future additions, expansion or further activity beyond the project scope known so question #7 is accurately filled out.

- *Add this note to the face of the short plat document. Prior to building permit issuance for each lot within this short plat, individual lot Stormwater reports will need to be submitted to verify the calculations in the stormwater report submitted during Short Plat review. The stormwater reports submitted during building permit review are required to contain saturated hydraulic conductivity testing and ground water monitoring during the wet season in accordance with the currently adopted stormwater manual and City Standards.? [short plat, pg. 1]*

**Response:** This note has been added to the Short Plat Map.

- *Add this note to the face of the short plat document. No Building Permits will be issued for Lot1 through Lot2 until City approved utility and road improvements are reviewed and approved to include curb, gutter, sidewalk, roadway base, pavement, water, sanitary sewer, storm infrastructure and street lighting.? [short plat, pg. 1]*

**Response:** This note has been added to the Short Plat Map.

- *Add this note to the face of the short plat document. A preliminary Storm Drainage Plan is on file for this short plat. No Building Permits will be issued for any lots in this short plat until all necessary drainage improvements are approved and permitted by Development Services Engineering. Compliance may require the property owner/builder to retain a Professional Engineer to design the stormwater controls for the individual lots.? [short plat, pg. 1]*

**Response:** This note has been added to the Short Plat Map.

- *Add this note to the face of the short plat document. NOTICE: This short plat contains 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, and allowing City inspection of the private storm system in accordance with a separately recorded stormwater management facilities agreement recorded with Pierce County. Ref. AFN \_\_\_\_\_? [short plat, pg. 1]*

**Response:** This note has been added to the Short Plat Map.

- *Add this note to the face of the short plat document. Erosion and stormwater control plans shall be required for any new residential development prior to building permit issuance on Lot 1 through Lot 2.? -No permanent structures(s) shall be erected within the 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 by the City 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. [short plat, pg. 1]**

**Response:** This note has been added to the Short Plat Map.

- **Add this note to the face of the short plat document. "The project site is designated a special flood hazard zone and was determined by examination of the Flood Insurance Rate Map (FIRM) Community Panel Number 53053C0341E, dated March 7, 2017. Prior to final building inspection and approval, a FEMA Elevation Certificate must be submitted and approved by the City of Puyallup Engineering Services Department verifying that the structure has been constructed and elevated in accordance with the City's Floodplain Management Regulations." "The project site is located in the regulated AE floodplain. Any new construction and substantial improvements in this zone must construct the lowest floor, including basement, a minimum one foot or more above the established base flood elevation. [short plat, pg. 1]**

**Response:** This note has been added to the Short Plat Map.

- **According to the submitted critical area assessment, an off-site wetland was found to the south of this project. Minimum requirement 8 must be evaluated for this project. [prelim storm report, pg. 10]**

**Response:** The Stormwater Site Plan has been revised to discuss Minimum Requirement #8 pertaining to the off-site wetland to the south.

- **The project is proposing to construct greater than 5,000SF of new plus replaced hard surfaces. Minimum requirement 9 must be addressed as part of this project. An O&M manual can be submitted at the time of civil. For now, reference that MR 9 will be addressed at the time of civil application. [prelim storm report, pg. 10]**

**Response:** The Stormwater Site Plan has been revised to state that an Operations and Maintenance Manual will be submitted at the time of civil application.

- **Provide a map legend [short plat, pg. 1]**

**Response:** A legend has been provided in the Short Plat Map, Site Plan, and Grading and Utility Plan

- **City standard details 01.02.12 requires a 3' paving from the driveway to any adjacent property lines. [short plat, pg. 1]**

**Response:** The 3 feet of space between the proposed lot line and the 12-foot driveway on Lot 1 is not required because an inverse crown will be provided within the driveway to collect stormwater runoff. This design has been approved by the City through correspondence during this review.

- **Minimum driveway width for a single-family home is 15'. [short plat, pg. 1]**

**Response:** Acknowledged. The driveway widths currently shown on the Site Plan have been approved by the City.

**Engineering Traffic Review** - Bryan Roberts; (253) 841-5542; [broberts@PuyallupWA.gov](mailto:broberts@PuyallupWA.gov)

- The city has adopted a City-Wide Traffic Impact Fee of \$4,500 per single family home. Final fees will be calculated and assessed by the City at the time of building permit issuance.

**Response:** Acknowledged.

- Park impact fee was established by Ordinance 3142 dated July 3, 2017, and shall be charged per new dwelling unit based on its size

**Response:** Acknowledged.

- 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, and pavement. Any existing improvements which are damaged now or during construction, or which do not meet current City Standards, shall be replaced.  
-To facilitate future streetlights, conduit and junction boxes will be required along frontage (lots 1 & 2).

**Response:** Acknowledged.

- *ADA compliant driveway approach is required for access.*

**Response:** Acknowledged.

- *14th St SW along the site is designated as a minor collector. City standards (Section 101.10.1) require minimum spacing of 150 feet.*
  - *Since this parcel already has two existing driveways, the existing single access will be allowed for this new lot.*

**Response:** Acknowledged.

**External Agency Review** - Nabila Comstock; (253) 770-3361; [NComstock@PuyallupWA.gov](mailto:NComstock@PuyallupWA.gov)

- *Please see Confluence Environmental Company's comment letter titled "Confluence Environmental Company Review 07182022 - 808 14th St SW\_3rd Party Review\_CoPuyallup\_Cycle 2\_071822" under Documents & Images. Revisions to the report are required.*

**Response:** The Revised Critical Areas Assessment dated August 29, 2022 which addresses the comments received by Confluence Environmental Company.

We believe that the above responses, together with the enclosed revised plans and technical documents, address all of the comments in your letter dated July 19, 2022. Please review and approve the enclosed

Nabila Comstock, Assistant Planner  
City of Puyallup  
Planning Division

-11-

September 12, 2022

at your earliest convenience. If you have questions or need additional information, please do not hesitate to contact me at this office. Thank you.

Sincerely,



Cheryl Ebsworth  
Senior Planner

CE/kb  
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enc: As Noted  
cc: