



December 2, 2024

Whipple Consulting Engineers, Inc.

WCE No. 2023-3505

City of Spokane  
808 W. Spokane Falls Boulevard  
Spokane WA, 99201

Attn: Melissa Owen, Assistant Planner

**Re: 3<sup>rd</sup> Response to Determination of Incompleteness  
Ash Place Townhomes – A Residential Subdivision under BOCA**

Dear Ms. Owen:

This letter is to confirm receipt and respond to the determination of incompleteness for the Ash Place Townhomes Preliminary Long Plat, dated November 26, 2024, for City of Spokane file number Z23-587PPLT. This letter will only address comments new to the 3<sup>rd</sup> agency review, please see our 1<sup>st</sup> and 2<sup>nd</sup> responses to the respective determinations of incompleteness for recurring comments. For clarity, City of Spokane comments are listed below and in italic type, and our responses are in roman type (upright).

*Planning, Melissa Owen:*

*A letter concurring with the Cultural Resource Survey by Plateau has been received (see attached letter dated November 4, 2024). The following conditions of approval were included in the concurrence letter.*

*Condition of Approval.*

*x) An Inadvertent Discover Plan implemented into scope of work. This condition will need to be met prior to any ground disturbing activities. Note: the CRS noted the IDP as Appendix A, but the Appendix was missing from the report.*

**WCE Response:** A CRS with the IDP in Appendix A is included with this submittal.

*Engineering, Joelle Eliason:*

*Revisions Required.*

*The following comments are required to be address prior to deeming the application Technically Complete.*

1. *As noted in the previous comments, “the primary access in and out of this plat must be via a private driveway located in a tract and named a “Lane” instead of an alley.” Please update the preliminary plat map to reflect this required revision.*

*M. Owen note – the above revision is staff driven and intended to ensure EMS service to proposed units 1-10, in Block 3. This staff request for private driveway tract as a named “Lane” does not trigger requirements for a Planned Unit Development.*

**WCE Response:** The internal access has been renamed to a private lane.

*2. Previous comments to be addressed:*

*a. The Geotechnical Conditions Report states that drywells and gravel galleries do not appear feasible due to the depth to basalt and recommends alternative methods such as retention or evaporation ponds. The conceptual drainage plan includes a gravel gallery.*

*WCE Response: "Gravel galleries have been removed from the concept report. A bioretention swale with a perforated underdrain pipe is now the proposed concept. See revised concept drainage report."*

*COS Response to revised submittal: The revised geotechnical report does not clearly define the pre-dev and post-dev flows to support the changes proposed above.*

**WCE Response:** The revised drainage report does state that the proposed stormwater solution can and will handle the 100-year stormwater event. As shown on Page 6 of the report, the pond is sized to handle all the required treatment volume for Post Basin 1 as required. It is also shown in Table 3 on this page, that the pond will hold and store the 100-year stormwater event. See full Revised Drainage Report for more information.

*b. The conceptual drainage plan shows an overflow discharge to the city system. Per the SRSRM, the overflow path shall drain toward the natural discharge point of the contributing basin. Please provide a down-gradient analysis for the proposed discharge and compare to the pre-developed condition.*

*WCE Response: "A down-gradient analysis is not necessary for this project, due to the fact that the overflow discharge point is in the same location as the pre-developed condition. Also, the post-developed offsite discharge is significantly less than the pre-developed condition. See revised concept drainage report."*

*COS Response to revised submittal: Further define the location of the pre-dev and post dev flow on the Pre-Basin Map A.*

**WCE Response:** The pre-dev and post-dev flows have been better defined on the revised Basin Maps within the revised drainage report.

*c. The Basin Summary for POST Basins 2 and 3 states that "For this analysis, it was presumed that all generated stormwater will be maintained on site, with flows exiting the City stormwater system only in the frozen-ground condition". Please provide the analysis for both basins and indicate where runoff will be maintained on site.*

*WCE Response: For Post Basin 2, offsite flows in the post-developed condition will be substantially less than that of the pre-developed condition. For example, in the 25- & 100-year pre-developed condition the offsite flows are approximately 2.08 & 3.48 cfs respectively. The postdevelopment offsite flows for this Basin 2 are approximately 0.94 & 1.57 cfs respectively, therefore, generating a much lesser impact downstream. For Post Basin 3, it was presumed that all generated stormwaters will be maintained on site within the backyards & landscaped areas of each lot, with emergency overflows to the existing City stormwater system within the street named "Ash Place" only in the frozen-ground condition.*

*COS Response to revised submittal: The post outflow flow calcs given for Posts 1-3 on the Basin Calculation Worksheet, the totals do not add up correctly on the table.*

**WCE Response:** The Basin Calculation Worksheet has been revised to make sure that the totals add up correctly. See revised calculation sheet.

*d. Per SMC 17G.080.040(B)(2)(r), locations of existing easements shall be included on the preliminary plat map. The neighboring property to the south currently has a driveway crossing the SE corner of this preliminary plat with (2) approaches adjacent to this parcel's frontage. Please show the proposed easement to be established for this driveway access or its removal.*

*WCE Response: The driveway has been identified as an easement on the preliminary plat.*

*COS Response: The easement is not clearly defined or dimensioned.*

**WCE Response:** The easement has now been dimensioned more clearly on the revised preliminary plat.

### *3. Wastewater Revisions:*

*Need to show easements for stormwater up to and including a 100-yr storm.*

**WCE Response:** All stormwater collection and treatment occurs within an open-space and stormwater Tract at the south end of the site. There is no need for an easement for the stormwater system.

*a. Flow is not concentrated relative to Ash St. that is downhill from there, and*

**WCE Response:** So noted. Stormwater is not concentrated relative to Ash Street. In the post-development condition, even less stormwater will be released than in the pre-development condition.

*b. Runoff is not increased over existing condition (if any flow) to Ash St.*

**WCE Response:** So noted. Runoff is not increased over existing condition.

*i. Drainage report indicates that the post developed condition is actually roughly half of the pre-developed 3.5 cfs (100yr).*

**WCE Response:** This is correct that the drainage report indicates that the post-developed condition is roughly half of the pre-developed condition.

*ii. There appears to be a 0.05 cfs discharge offsite from storms up to the 100-yr storm as a Design Variance requested based on the drainage report. This will be evaluated by WWM staff; there was one report of issue with downstream storm drains.*

**WCE Response:** So noted. The design deviation will be submitted during the formal design review process prior to final plat.

### *Wastewater Management*

*ff) Mutual Use & Maintenance Agreement / Covenants are required on the plat language for both sanitary sewer and storm drainage and should be recorded on all associated properties.*

**WCE Response:** This requirement will be addressed prior to recording the final plat.

*gg) For the conceptual stormwater report, the following items need to be corrected or clarified:*

*a. The design deviation for the conceptual stormwater report for the proposed discharge rate of 0.05cfs must be submitted and approved prior to approval of the final plat.*

**WCE Response:** The design deviation will be submitted during the formal design review process prior to final plat.

If you have any questions or comments regarding this letter, please feel free to contact me at (509) 893-2617.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin J. Fuller", with a long horizontal flourish extending to the right.

Austin J. Fuller, Assistant Planner  
Whipple Consulting Engineers, Inc.

Encl: Updated preliminary plat  
Updated Concept Drainage Report  
Cultural Resource Survey with IDP

CC: Sponsor  
File