



Whipple Consulting Engineers, Inc.

October 10, 2024

WCE No. 2023-3505

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

Attn: Melissa Owen, Assistant Planner

**Re: 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 September 6, 2024, for City of Spokane file number Z23-587PPLT. For clarity, City of Spokane comments are listed below and in italic type, and our responses are in roman type (upright).

Planning, Melissa Owen:

- 1. A local resident called during the agency review period identifying the presence of seasonal standing water on the subject site. While no standing water was encountered during the preliminary geotechnical evaluation, the geotechnical report notes the expectation of seasonal groundwater perching above bedrock where present (bottom of page 2 and top of page three of the geotechnical report). As such a wetland delineation is merited to determine if a wetland exists on the subject site.*

WCE Response: WCE consulted with Larry Dawes, habitat biologist, regarding the project site, who determined that there were no wetlands on the subject property. The geotechnical engineer stated that seasonal groundwater may be present on the site, not surface water; therefore, it is our opinion that a wetland delineation is not and was not merited for this site as there are no wetlands present to delineate. **Email correspondence from Habitat Biology attached, MDO)**

Geotechnical Report

- 2. The geotechnical report needs to be updated to reflect the City of Spokane Code (17E.040 The current report details references Spokane County.*

WCE Response: The geotechnical report has been updated to reflect City of Spokane Code.

- 3. The geotechnical report references division of land into three tracts. This is inconsistent with the proposed layout which includes 20 lots for attached units and several tracts.*

WCE Response: While WCE believes that this comment is immaterial, the geotechnical report has been updated to be consistent with the subdivision application.

Plat Map:

4. *The plat map site data table includes a total impervious surface number that does not match the total impervious coverage identified in the SEPA submittal of 35-40% of the land area.*

Please revised the site data table to address this inconsistency.

WCE Response: Please see the updated preliminary plat for an updated impervious surface calculation of 51%. It should be noted that all impervious surface areas are estimates at time of preliminary plat, as building design will not be finalized until time of building permit submittal. WCE does not propose to change the SEPA Checklist as these are still preliminary calculations and subject to change as design of the project finalizes.

5. *Please identify the proposed use/structure type shown on Tract D. This appears to be a stormwater-related facility, but there is no detail related to this structure on the plat map.*

WCE Response: A stormwater facility has been included in Tract D. Please note that all stormwater facilities shown are preliminary and will be finalized during the construction plan set phase.

6. *Please clarify the proposed use of each tract.*

WCE Response: Tract uses have been identified on the preliminary plat as alleys or storm drainage/open space tracts.

7. *Please verify that L3B1, L1B2 meet the minimum lot depth of 80' over at least 16' of width. Each lot does need to meet both the lot depth for 16' of width minimum as required under 17C.400.010.*

WCE Response: All lots have been verified to meet a minimum lot depth of 80 feet over at least 16 feet of width.

8. *As previously indicated by planning and engineering, the vehicular access to each unit will be private; however, this correction was not included in the revised submittal. Please continue to work with engineering staff on this aspect of the project and update the map and other application materials accordingly.*

WCE Response: The alleys have been identified as private on the preliminary plat.

i. *Please note that wastewater may have additional comments regarding utility easement language once the map reflects private vehicular access to the site. Any easement language will be identified as for addition to the final plat dedication page. See enclosed email from Duane Studer dated 07/30/24.*

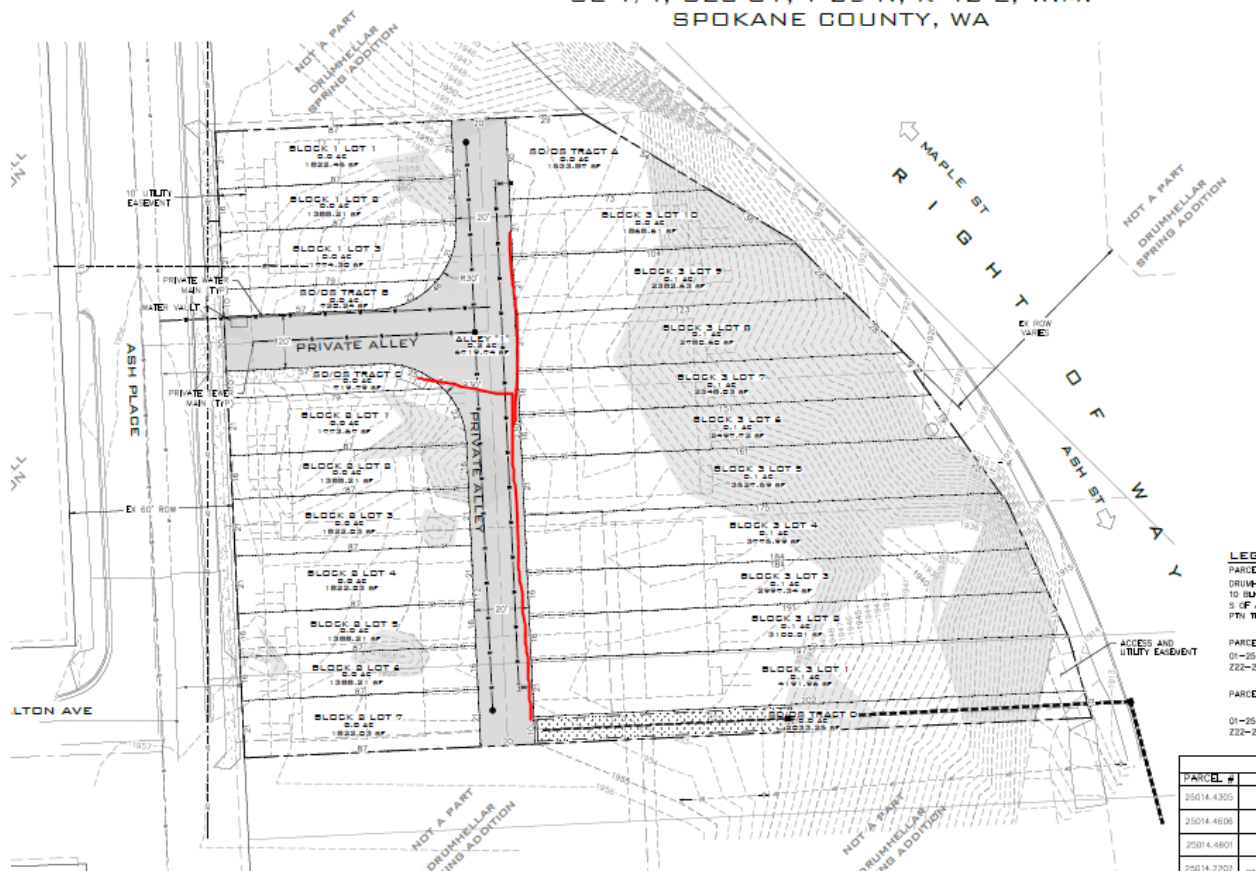
WCE Response: This comment will be addressed at time of final plat.

9. *Basic pedestrian standard in residential zones includes separated sidewalk – a 5' wide sidewalk with minimum 5' wide continuous plant strip between the curb and walk. Please update the plan map to include separated sidewalk along N. Ash Place (or as an alternative to providing a continuous planting strip between the curb and sidewalk, tree wells may be cut into the existing sidewalk with a new 5' wide sidewalk to the property size of the existing sidewalk to address the basic residential-zone requirements for separated sidewalk).*

WCE Response: The preliminary plat has been updated to include separated sidewalks.

10. If no internal pedestrian connection will be provided from block 3 homes to the adjoining public sidewalk along Ash Street, please show how pedestrian will travel between the public sidewalk located along Ash Place and building entrances of homes located on block 3 lots. In addition to meeting concurrency standards for pedestrian access, the interim zoning code under which this plat has received vesting includes design standards that address connectivity through front yard and entrance implementation (17C.400.030, subsections B and D).

WCE Response: Pedestrians will traverse the private alley to reach the sidewalk located in Tract "C" on the south end of the east-west private alley.



11. During the initial review planning requested clarification of the presence of erodible soils identified in the SEPA under Land and shoreline Use (subsection 8. h. on page 14 of 20) as the City's internal GIS maps were not showing any erodible soils in proximity to the proposal site. SEPA subsection 8. h. has been revised to state that "No part of the site has been classified as a critical area by the city or the county." Based on the City's definition of critical areas (any areas of frequent flooding, geologic hazard, fish and wildlife habitat, aquifer sensitive areas, or wetlands as defined under chapter 17E.010 SMC, chapter 17E.020 SMC, chapter 17E.030 SMC, chapter 17E.040 SMC, and chapter 17E.070.SMC) and supplemental materials provided for a 2nd agency comment period, the site is impacted by critical areas including potentially geologically hazardous areas and critical aquifer recharge area (moderate) for example.

Note: Based on the materials submitted for review and because implementation of the City's adopted standards for critical areas are intended to address basic mitigation in critical areas,

planning is not requesting additional reports or specific mitigation plans at this time. The City's various critical area codes will continue to be reviewed for compliance throughout the final plat and construction-related permitting processes.

Note: Please be advised that M. Owen reached out to WDFW regarding habitat maps for this area and no habitat management plans are recommended. Please see email correspondence with Kyle Westerman on 08/26/24.

WCE Response: This comment has been noted. It appears that based upon the first note, this comment is general in nature and not related to approval of the SEPA or project.

*City of Spokane Fire Protection Engineer:
Revisions Required.*

12. Turning radii for fire apparatus is 28' internal and 50' external.

WCE Response: The internal turning radii for the private alley has been increased to 30 feet.

*WA Dept. of Archeology and Historic Preservation (DAHP):
Revisions Required.*

13. Plateau CRM need to upload the Cultural Resource Report to WISAARD under 2024-01-00174 for comment response.

WCE Response: WCE submitted the final Cultural Resource Survey to DAHP on Monday, September 30, 2024.

*Engineering, Joeline Eliason:
Revisions Required.*

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

14. 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. City of Spokane will not approve new construction of public water and sewer mains in alleys due to access and maintenance concerns.

WCE Response: The internal private alleys have been noted as alleys in the preliminary plat.

*15. For the conceptual stormwater report, the following items need to be corrected or clarified:
a. The report includes the reference "Per City guidelines, the site is allotted to discharge at a rate of 1.5 gallon per minute per acre." Please clarify as this discharge rate applies for systems connecting to Hazel's Creek via a special connection agreement, it is not a City-wide standard.*

WCE Response: The discharge rate has been revised to be a proposed rate of 0.05 cfs. We understand that this will need a design deviation request approved by the City but are confident due to the fact that this rate has been allowed and approved by the City several times in the past.

b. 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 bio-detention swale with a perforated underdrain pipe is now the proposed concept. See revised concept drainage report.

c. The conceptual drainage plan shows an overflow discharge to the city system. Per the SRSM, 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.

d. 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 post-development 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.

16. Per SMC 17G.080.040(B)(2)(r), locations of existing easements shall be included on the preliminary plat map.

WCE Response: Existing easements are shown on the preliminary plat, Sheet PP2.

a. Per Kelly Final City Short Plat (AFN 7249860), there is a ten-foot easement for utilities along the Ash Place street frontage.

WCE Response: A ten-foot utility easement is identified on the preliminary plat, Sheet PP1.

b. Please show or reference easement with AFN 8905230018.

WCE Response: The easement identified under AFN 8905230018 has been shown on the preliminary plat Sheet PP2.

c. 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.

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

Sincerely,



Todd R. Whipple, P.E.
President, Whipple Consulting Engineers, Inc.

Encl: Updated preliminary plat
Updated Concept Drainage Report
Cultural Resource Survey submitted to DAHP
Wetland Report email

CC: Sponsor
File

From: bswinc@icehouse.net
To: [Austin Fuller](mailto:Austin_Fuller)
Cc: [Todd Whipple](mailto:Todd_Whipple); [Ben Goodmansen](mailto:Ben_Goodmansen); brad@boswellhomes.com; "Ron Thomas"
Subject: RE: Ash Place Townhomes Wetland delineation/letter WCE 3505
Date: Monday, September 9, 2024 4:52:06 PM
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.aif](#)
[image005.aif](#)
[image006.png](#)

Greetings all:

I completed a wetland reconnaissance at the site located at 3242 N. Ash. N. Ash Place defines the west edge of the property and N. Ash Street defines the east edge of the property. The building site is located on a terrace about 30 feet higher in elevation than N. Ash Street. Heading east from N. Ash Place the surface elevation rises a bit so no surface water runs onto the site from the road or adjacent properties to the west. The west 3/4 of the property is rock outcroppings and shallow soils on top of bedrock. The vegetation on the terrace is distinctly upland in character. The highest elevation occurs near the center of the property, so the site slopes north, south, east and west from that central high point with the most dramatic slope being east toward N Ash St. The east ¼ of the site is characterized by a steep drop in elevation down to N Ash Street. The steep slope has an overstory of maple trees and understory dominated by Oregon grape and other upland shrubs and grasses. No wetland characteristics were observed on the hillside or at the toe of the slope. Google Earth air photos indicate spoil piles were placed on the terrace between 2006 and 2009. Some of the piles may have been removed later. More spoil piles appeared between 2015 and 2016. The spoils include some concrete and steel cable, but mostly consist of soil and rock cobbles. The surface conditions under the spoils could not be evaluated, but historical air photos do not indicate any depressions or characteristics other than rock outcrop. I did not observe any wetland soils, vegetation, or hydrology. A neighbor stated there was standing water somewhere on the site but I do not know the year or date of that observation. It is possible that surface water could temporarily pond on top of bedrock for brief periods of time from rain or snow, but the depressions are not of sufficient depth or area for surface water to exist two weeks into the growing season. None of the subtle depressions observed would meet the wetland hydrology criteria or hydrophytic vegetation criteria as required to be defined as a wetland. Feel free to share this assessment with your clients and jurisdictions. If you have comments or require additional information, please contact me at your convenience.

Good luck with the project.

Larry

Regards

Larry Dawes

Biology Soil & Water, Inc.

3102 N. Girard Road

Spokane Valley, WA 99212-1529

(509) 327-2684

bswinc@icehouse.net

From: Austin Fuller <afuller@whipplece.com>

Sent: Friday, September 6, 2024 12:02 PM

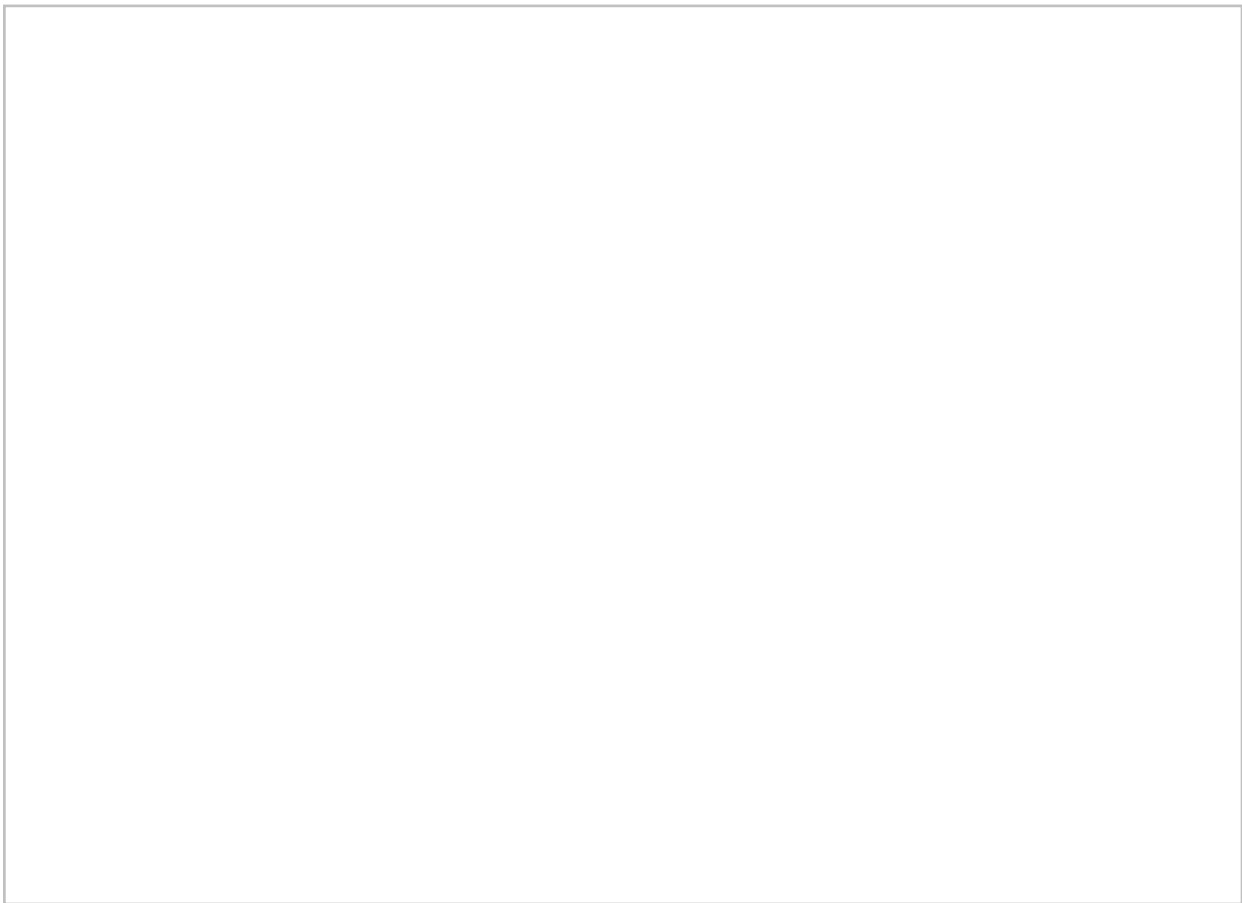
To: bswinc@icehouse.net

Cc: [Todd Whipple](mailto:Todd_Whipple) <toddw@whipplece.com>; [Ben Goodmansen](mailto:Ben_Goodmansen) <bgoodmansen@whipplece.com>; brad@boswellhomes.com; 'Ron Thomas' <myspokanebanker@yahoo.com>

Subject: Ash Place Townhomes Wetland delineation/letter WCE 3505

Hello Larry,

We are working on a preliminary plat on 3242 N. Ash Place. The city received a letter that there was standing water on the site and is requiring a wetland delineation for this project. Could you please go out and verify if a wetland is present on site? I've attached the current preliminary plat, the geotechnical report and the letter from the City in case you need any of those documents.



Austin J Fuller

Assistant Planner, CESCL

[Whipple Consulting Engineers, Inc.](#)

Phone: 509.893.2617 | Fax: 509.926.0227

