

October 30, 2023 WCE No. 2021-3109

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

Attn: Melissa Owen, Associate Planner

# Re: Response to Determination of Incompleteness Beard Addition – A Residential Subdivision and PUD

Dear Ms. Owen:

This letter is to confirm receipt and respond to the determination of incompleteness for the Beard Addition Preliminary Long Plat and PUD letter dated October 20, 2023, for City of Spokane file number Z23-190PPUD. For clarity, City of Spokane and agency comments are listed below and in italic type, and our responses are in roman type (upright).

## Planning:

Corrections Required.

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

1. Please submit any revised wetland material to City of Spokane as part of your response to this Technically Incomplete Letter so these materials can be included in the land use record and distributed as part of a formally noticed request for agency comment. Please note that Planning will review this material and provide comment as part of your next submittal intended to respond to this letter.

WCE Response: The revised wetland material was submitted to the City of Spokane on October 25, 2023.

2. Please clarify/update description on PP6-PP11 that the existing platted lots in the wetland buffer area under Lennar ownership are being re-located outside of the wetland buffer as part of a separate land use action (Z23-108FPLT).

**WCE Response:** The updated preliminary plat now indicates that the two existing platted lots under Lennar ownership are being relocated outside of the wetland buffer as part of Z23-108FPLT.

3. Please update description of existing platted lot under separate ownership (parcel 25263.2904) on sheets PP6-PP11 to clarify that this land is vacant and under separate ownership.

WCE Response: The preliminary plat has been updated on Sheets PP6 to PP11 to clarify that the land is vacant and under separate ownership.

21 South Pines Rd. • Spokane Valley, WA 99206 PO Box 1566 • Veradale, WA 99037 Phone 509-893-2617 • Fax 509-926-0227 • WhippleCE.com • Info@WhippleCE.com Civil, Structural, Traffic, Survey, Landscape Architecture and Entitlements Beard Addition Response to Determination October 30, 2023 Page **2** of **25** 

4. Since the proposed wetland buffer modification impacts parcel 25263.2904 under separate, private ownership by Debbie Robertson – please clarify how this proposed modification impacts this parcel and advise if these proposed changes have been communicated by the applicant to the impacted property owner.

**WCE Response:** Please note that the updated wetland delineation report states that the wetland is category IV with a 50' buffer. The wetland buffer now no longer affects Ms. Robertson's property.

5. The City's wetland code limits trail width to a 5 ft-wide pervious trail with only minor crossings and with minimum impacts. Additionally, the tail may only be in the outer 25% of the wetland buffer. Currently the tail proposed is too wide (the trail continues to be shown at 8' wide while the response letter indicates that this correction was made). Please update maps to meet these requirements. See 17E070.110(G.1.).

**WCE Response:** Due to the updated wetland delineation, the trail no longer enters the wetland buffer and may be 8' wide.

6. Please update your outdoor space calculations as needed for any new modification to the wetland and wetland buffers (new wetland and buffer area sent to Dept. Of Ecology Oct 4, 2023, but revision not been submitted to the City of Spokane).

**WCE Response:** Please see the updated preliminary plat Sheet PP1 for the new outdoor space calculations.

7. The City of Spokane disagrees with the applicant's interpretation of the SMC regarding use of the wetland and associated buffer toward required open space in the PUD code – see 17G.070.030(E). Constrained land associated with the wetland and wetland buffer may not exceed 50% of the total required common space under the PUD code (common space required is at least 10% of the gross project area). Wetlands and their associated buffers are regulated under the Wetlands Protection Chapter of the SMC (SMC 17E.070) and apply to all activities and development occurring in a wetland or wetland buffer. Regulated activities in a wetland or wetland buffer include construction and maintenance of pervious trails (17E.070.040). These areas will be deed restricted with any permanent conditions imposed legibly shown and described in a permanent covenant with the property recorded with the Spokane County Auditor's Office prior to the issuance of any permit or at the time a plat is recorded (17E.070.090). Additionally, the buffer areas include structural setbacks from the identified buffers, further providing wetland protection at the buffer edge. etc. Please note that the City of Spokane will not be able to support portions of this application that do not address applicable code requirements in the SMC. Absent modification to the current proposal, a future staff report will include recommendations for hearing examiner consideration to address PUD open space requirements including limits on constrained land that may be utilized to meet open space requirements.

**WCE Response:** While WCE disagrees with the City of Spokane regarding this comment, the revised wetland buffer allows for additional open space regardless. This

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comment is not relevant to the updated preliminary plat as Tract A2 (containing the area outside the wetland) is 5.5 acres, which is greater than the 3.49 acres of open space required.

Items to be addressed prior to final plat approval (authorization to print, sign, record).

1. Vicinity map – please use only black and white on your maps including vicinity map and produce the vicinity map on the final plat map at a scale where street names are legible to avoid issued with recording at the County.

**WCE Response:** The final plat map will be in black and white with a scale wherein street names will be legible for recording purposes.

2. Pursuant to 17G.070.030, the common open space designated to meet common open space requirements for the proposed PUD shall be permanently maintained by and conveyed to a homeowners' or property owners' association as regulated by state law. This will be included as a condition of approval for the PUD Plat.

WCE Response: All common open space designated to meet common open space requirements will be maintained by and conveyed to a homeowner's or property owner's association.

- The landscape plan will be reviewed and approved as part of the final plat process. Street trees will need to be added to lots within the PUD that have frontage along 21st Avenue.
   WCE Response: The landscape plan will be submitted as part of the final platting process.
- 4. The SMC does not specifically identify that driveway coverage (or approach) limits may be modified under the PUD process. A separate engineering design variance would be required through engineering in the development services center. Engineering recommends review of any variance related to approaches/driveways at time of review for civil engineering plans associated with this development. Please also refer to Engineering General Comment (vii.e.) below that was include in the initial comment letter and continues to be included in this letter. Because the PUD code identifies that driveways should not be the dominant feature along the street frontage (17G.070.135.B.4 and 17G.070.140.B.4), planning would like to see additional landscaping including trees or other plantings in front yards to address this concern.

**WCE Response:** We acknowledge staff's comments; however, code does not preclude wider driveways beyond the 40%. Per SMC 17G.070.010(A)(1), the PUD is designed to allowed for greater flexibility in how the land is designed and prepared. If the Hearing Examiner requires a variance for driveway width, WCE will complete one at time of civil design.

5. The easement recorded under AFN 9602140328 proposed to be released by the applicant will need to be completed prior to approval of the final plat or the plat modified to incorporate this easement if release is not obtained. Please note that the current easement appears to impact 10 lots adjoining proposed tracts A2, B, and C.

**WCE Response:** The temporary easement recorded under AFN 9602140328 will be released prior to approval of the final plat.

- 6. We are in receipt of DAHP's concurrence with the cultural resource survey that also addresses existing structures on the lot. With regard to existing structures:
- a. Any existing accessory structures will need to be removed prior to final plat or a cash bond placed for the demolition and removal of all debris as an alternative to demolition (assuming that any retained structures would not cross property lines).

**WCE Response:** This comment regarding demolition will be addressed prior to final platting.

b. Any structures on the property proposed for demolition that are over 200 sq. ft. in size will required a separate demolition permit and compliance with Spokane Regional Clean Air Agency requirements. For structures under 200 sq. ft., please work with Spokane Regional Clean Air to following their process.

**WCE Response:** All onsite standing structures are greater than 200 sf and will be addressed prior to final platting.

7. We are in receipt of a deed restriction template for protected wetlands in Spokane County. Please note that any deed restriction templates utilized for this plat would need to be modified for the City of Spokane.

**WCE Response:** This comment is noted and will be addressed prior to final plat approval.

# General Comments.

The following comments are general in nature and intended to provide guidance during the preliminary and final platting process.

- Depending on the timing of the alteration to the Westridge Addition PUD, the legal descriptions for parcel included in this application may change. This will be reviewed as the PUD Plant and CUP application progresses through this application and approval process.
   WCE Response: This comment is noted and revisions will be implemented as necessary.
- 2. The final PUD/Plat will be reviewed for compliance with 17G.080.040 subsections F, G, and H regarding final plat procedures, map requirements, and filing of the final plat. Please also see 17G.080.050 (subsection G, H, I) for final subdivision procedure, map requirements, and filing.

WCE Response: This comment will be addressed during the final platting process.

- 3. No request for modification from the residential single family (RSF) lot size or dimensions has been requested as part of this PUD Plat application. All lots will be review for compliance with lot size and dimensional standards as this application progresses through preliminary and final plat consistent with table SMC 17C.110-3. WCE Response: This comment is noted.
- a. Please note that B2 Lot 16 includes a rear lot dimension that appear to be incorrect.
   WCE Response: This comment is noted and the lot dimension has been corrected.
- 4. Required setbacks from wetland buffers will be evaluated throughout the platting process and confirmed at the time of building permit. Consistent with 17E.070.110(H) structures are

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generally prohibited with some exceptions. The basic setbacks standard is 10' from the wetland buffer. This will be a condition of approval for this PUD/Plat.

**WCE Response:** Please see the revised plans based on comments received from the Washington State Department of Ecology. We will request a deviation from SMC 17E.070.110(H) for accessory buildings.

5. Phasing - phasing is not proposed by the applicant; however, should phasing become necessary or desired, please note that phasing must meet the requirements found in 17G.080.050(F) - Phasing.

**WCE Response:** At this time we do not anticipate any phasing; however, phasing may become necessary and at such time a phasing plan consistent with SMC 17G.080.050(F) will be completed.

6. As noted in the preliminary comments provided to the applicant prior to formal submittal of for this combine type III PUD Plat and Wetland Modification CUP, and consistent with SMC 17G.070.030 (C.3.a.i.), the front and rear yard setbacks of all lots within 80' of the perimeter of the project shall be the same as that required by the base zone. Compliance with this requirement will be reviewed as the project moves forward and will be included as a condition of approval for the PUD Plat.

**WCE Response:** This comment is noted, setbacks regarding structures within 80' of the perimeter of the project will be the same as those required within the base zone.

7. Pursuant to 17G.070.030 (C.7) perimeter fencing for PUDs are permitted except the maximum height of fencing along a street frontage of the PUD development may not exceed 42" in height. When a fence is along a street frontage, usable pedestrian access shall be provided and spaced a minimum of one every three hundred feet. Compliance with this section of code will be a condition of approval for the PUD/Plat.

**WCE Response:** This comment is noted. At this time the developer does not have plans for perimeter fencing; however, if desired at a later date, the project will follow the height restriction of 42" for street frontage.

8. Please note that the city offers benefits for retaining mature trees/tree stands. Please reach out to Urban forestry at 509-363-5495 for more information about the tree retention program. See also SMC 17C.200.150. Retention of mature tree stands could asst you in meting requirement/presumption under 17G.070.120(A.5.).

**WCE Response:** At this time it should be expected that all trees will be removed from the site, except for the trees within the undisturbed wetland tract areas.

9. Please note that we recommend that you submit your final plat maps and landscape plan with engineering plans for street and utility improvements in order that plans be reviewed for any conflicts.

**WCE Response:** WCE plans to submit final plat, landscape plan and engineering plans simultaneously.

#### Conditions of Approval

1. Front and rear yard setbacks of all lots within 80' of the perimeter of the project shall be the same as that required by the base zone pursuant to SMC 17G.070.030 (C.3.a.i) – Planned Unit Developments, setbacks, front and rear yard setbacks.

WCE Response: Front and rear yard setbacks within 80' of the perimeter of the project will be the same as the base zone.

2. Perimeter fencing for the PUD is permitted except the maximum height of fencing along a street frontage of the PUD development may not exceed 42" in height: When a fence is along a street frontage, usable pedestrian access shall be provided and spaced a minimum of one every three hundred feet. Compliance with this section of code will be a condition of approval for the PUD/Plat pursuant 17G.070.030 (C.7)

**WCE Response:** This comment is noted. At this time the developer does not have plans for perimeter fencing; however, if desired at a later date, the project will follow the height restriction of 42" for street frontage.

3. Pursuant to 17G.070.030, common open space for the proposed PUD shall be permanently maintained by and conveyed to a homeowners' or property owners' association as regulated by state law.

**WCE Response:** This comment is noted, a Homeowner's Association with CC&R's will be established at time of final plat.

4. Consistent with 17E.070.110(H) structures are generally prohibited in the wetland buffer with limited exception outlined in the SMC.

**WCE Response:** This comment is noted. At this time, no structures are proposed that would be in the remaining buffer. Please see the mitigation plan.

5. The SMC places limitation on use of wetland and wetland buffers for stormwater treatment. Please see 17E.070.110(G.2) and 17E.070.120(3). Compliance with aforementioned code sections will be verified at time of engineering plan review.

**WCE Response:** This comment is noted. As stated previously, there will be a pervious trail path; however, a small section of the trail is proposed to be impervious and is proposed to have a viewing station for inclusivity.

6. Pedestrian Connections shown on the preliminary PUD Plat maps and proposed to address connectivity requirements under the SMC through tracts B, C, and into A2, etc. are required to be paved and a minimum of 5' wide (Connections within outer 25% of the wetland buffer area must be of a pervious surface and are limited to a maximum 5' width).

**WCE Response:** The path on tracts B and C may be paved and 5' wide where permitted and required. Please see the attached Sheet PP12. Regarding the wetland buffer area, the updated wetland buffer of 50' removes the 8' wide crushed gravel path from the wetland buffer entirely.

7. This Beard Addition plat is dependent on 21st Ave improvements and infrastructure plans approved under City Project Numbers 2022554-2022557 as noted by engineering below.

Based upon engineering comment no. 36, the following conditions of approval for the preliminary PUD/Plat have been included by planning:

- a. If 21st is not improved via the Alteration to Westridge Plat, these same improvements (Project numbers 2022554-2022557) must be built via the Beard Addition Plat.
   WCE Response: 21<sup>st</sup> is planned to be improved via the Alteration to Westridge Plat; however, if it is not improved, it will be improved with the Beard Addition PUD.
- b. This plat is dependent on the Alteration to Westridge Plat dedicating parcels 25263.2809 and 25263.3003 as public right-of-way. The Beard Addition Final Plat cannot be finalized until adequate public right of way is dedicated to connect this plat to 21st Ave.

**WCE Response:** This project will not be finalized until adequate right of way is dedicated to connect Beard Addition to  $21^{st}$  Avenue.

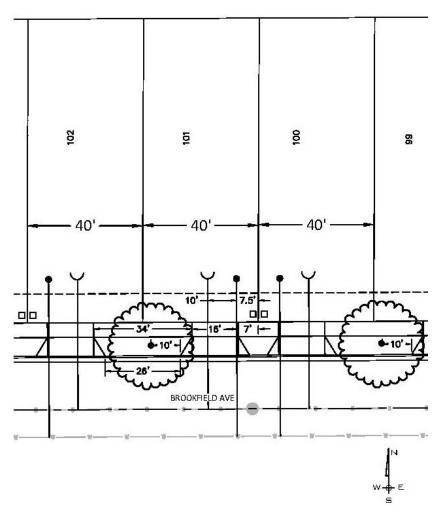
Dedications to be added to the "final" PUD Plat Dedication Page.

- 8. Please add the following language to the dedication page for the PUD Plat:
- a. "If any archaeological resources, including sites, objects, structures, artifacts, and/or implements, are discovered on the project site, all construction and/or site disturbing activities shall cease until appropriate authorities, agencies, and/or entities have been notified in accordance with Chapters 27.44 and 27.53 RCW."

**WCE Response:** This comment is noted; however, it should be noted that the Cultural Resource Survey for the project found no artifacts onsite, and an inadvertent discovery plan is appropriate moving forward.

b. Street trees are required. Compliance will be verified at time of certificate of occupancy for each new home consistent with the development's approved landscape plan.
 WCF Response: This comment is noted: however, it should be noted that a 40' lot with

**WCE Response:** This comment is noted; however, it should be noted that a 40' lot with utilities can only support one tree on every other lot. Below is a diagram identifying the location of utilities, driveways and the street trees.



Engineering – Development Services Center (DSC) Corrections Required. The following items must be addressed prior to approval of the preliminary plat:

Please change 23rd and 24th to have Ave as the suffix instead of St.
 WCE Response: The suffix for 23<sup>rd</sup> and 24<sup>th</sup> has been updated to Ave.

The following comments must be addressed prior to approval of the final plat:

1. Addresses must be shown on the final plat. Address permits can be applied for at the City of Spokane permit center, or by emailing a request to addressing@spokanecity.org, or by calling (509) 625-6999.

Note from M. Owen: Address fees for 119 lots have been assessed and paid for under Z23-190PPUD.

WCE Response: Addresses will be shown on the final plat.

2. Lot plans, following the criteria outlined in the Spokane Regional Stormwater Manual Appendix 3C, must be submitted for review.

**WCE Response:** Lot plans will follow the criteria of the SRSM and will be submitted for review.

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- 3. Applicable dedicatory statements must be added to the final plat dedication detailing who the tracts are being dedicated to and for what purpose. A Homeowner's Association must be established for the maintenance of all shared private facilities within the plat. Final plat dedication must reference the recording information of the document establishing the HOA. WCE Response: Applicable dedicatory statements detailing the ownership of tracts will be added to the final plat dedication.
- 4. The City of Spokane will be responsible for the maintenance of the storm lines in the street. The HOA will be responsible the maintenance of all tracts and stormwater facilities located on tracts as well as pipes connecting tracts to the City's storm lines in the streets.
  WCE Response: The HOA will be responsible for maintenance of all tracts and stormwater facilities located for said tracts, as well as pipes connecting tracts to the City of Spokane's storm lines in the streets.
- 5. All easements, both public and private, must be shown or referenced on the final plat. There are several easements showing in the title report that must be referenced on the final plat. If blanket in nature, the easement must be referenced in a Surveyor's Note.

**WCE Response:** All public and private easements will be shown or referenced on the final plat.

- 6. Engineered construction plans for public street, sewer, water, and storm water systems must be approved for construction and the improvements must be completed prior to plat finalization. Street and storm improvements may be bonded for, however, all water and sewer improvements must be installed and accepted for service prior to plat finalization.
   WCE Response: This comment will be addressed at time of construction plan submittal.
- Centerline Monuments must be set by a Licensed Surveyor at every intersection, the beginning and end of every horizontal curve, and at the center point of each cul-de-sac. Monuments must be installed following Section H of the City of Spokane Standard Plans. https://static.spokanecity.org/documents/business/designstandards/2023/standard-planssection-h-2023-04-19.pdf.

If a monument cannot be set due to a manhole or other utility conflict, offsets must be scribed on the curbs. An as-built drawing of the offsets must be turned in with enough detail that the location can be calculated at a later time. These as builts are required to be turned in to Construction Management before the project is considered complete.

WCE Response: Centerline improvements will be shown on street improvement plans.

8. This project is located in the Highland Pressure Zone which has pumping capacity and storage concerns. An electronic copy of an overall water plan and hydraulic analysis must be submitted to Development Services for review and concurrence. The hydraulic analysis must include supporting calculations for domestic and fire flows in accordance with City standards and regulations.

**WCE Response:** This comment is noted, a hydraulic analysis was submitted to the City of Spokane on April 18, 2023. The project and the water department are continuing to

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discuss options for service. We continue to work with the City of Spokane on their water deficiencies.

General Comments.

9. Any transportation impacts will be addressed by others. Note from M. Owen: transportation impact fees are found under SMC 17D.075. Any questions about impact fees may be directed to Inga Note at 509- 625-6331.

WCE Response: WCE currently has no questions regarding impact fees.

10. Construction plans for public street, sewer, water, and stormwater systems must be designed by a Professional Engineer, licensed in the State of Washington, and submitted to Development Services for review and acceptance prior to construction.

**WCE Response:** Construction plans for public street, sewer, water and stormwater systems will be designed by a professional engineer licensed in the State of Washington and will be submitted to development services for review and acceptance prior to construction.

11. The developer will be responsible for all costs associated with design and construction of sanitary sewer, stormwater, water, and street improvements necessary to serve the proposed plat.

WCE Response: This comment will be addressed in the construction phase.

12. Infrastructure plans for water, sewer, street, and stormwater improvements have been approved for the construction of 21st Avenue between Grandview Ave and H St. in association with the Alteration to Westridge Plat. This Beard Addition plat is dependent on these 21st Ave improvements. Infrastructure plans were approved under City Project Numbers 2022554-2022557.

**WCE Response:** Infrastructure plans for this project depend on the 21<sup>st</sup> Avenue improvements. As noted, we will wait until those plans for 21<sup>st</sup> Avenue are construction prior to final platting Beard Addition.

- a. If 21st is not improved via the Alteration to Westridge Plat, these same improvements (Project numbers 2022554-2022557) must be built via the Beard Addition Plat.
   WCE Response: If 21<sup>st</sup> is not improved via the Alteration to Westridge Plat, those improvements will be built with the Beard Addition Plat.
- b. This plat is dependent on the Alteration to Westridge Plat dedicating parcels 25263.2809 and 25263.3003 as public right-of-way. The Beard Addition Final Plat cannot be finalized until adequate public right of way is dedicated to connect this plat to 21st Ave.
   WCE Response: This comment is noted, the owners are working with the city on dedication of these areas.
- 13. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and, per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat. Pre-development

flow of any off-site runoff passing through the plat shall not be increased (rate or volume) or concentrated due to development of the plat, based on a 50-year design storm. An escape route for a 100-year design storm must be provided.

**WCE Response:** This comment is noted, at this time and due to the development to the east which blocked the overland route, and while an overland route has been determined, it is generally unusable; therefore, the water budget (evaporation) with limited infiltration is expected.

a. It is noted that stormwater is proposed to be discharged in areas with wetlands located within the project area. Any wetlands and/or buffer zone modifications required due to stormwater impacts and/or any other development impacts must be completed in accordance with City regulations and standards and the work must be inspected and approved by the City prior to the City Engineer signing a final plat for any phase of the proposed development.

**WCE Response:** It should be noted that as allowed by the wetland biologist in order to maintain wetland hydrology, stormwater treatment may occur in the outer 25% of the wetland buffer adjacent to the path.

b. No building permit shall be issued for any lot in the plat until evidence satisfactory to the City Engineer has been provided showing that the recommendations of SMC 17D.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and the Project Engineer's recommendations, based on the drainage plan accepted for the final plat, have been complied with. A surface drainage plan shall be prepared for each lot and shall be submitted to Engineering Services – Development Services for review and acceptance prior to issuance of a building permit.

WCE Response: This comment will be addressed prior to issuance of building permit.

*c. Prior to construction, a grading and drainage plan shall be submitted to Development Services for review and acceptance.* 

**WCE Response:** A grading and drainage plan will be submitted to Development Services for review and acceptance prior to construction.

d. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to Development Services for review and acceptance prior to construction.

**WCE Response:** A SWPPP will be submitted to Development Services for review and acceptance prior to construction.

e. If drywells are utilized, they will be tested to ensure design infiltration rates are met. A minimum factor of safety of 2 (two) will be required. In accordance with State Law, existing and proposed Underground Injection Control structures need to be registered with the Washington State Department of Ecology. Proof of registration must be provided prior to plan acceptance.

**WCE Response:** This comment is noted; however, it is WCE's understanding that drywell testing is not a requirement within the City of Spokane. If drywell testing will be required, it should be noted in the conditions of approval. At this time, the preliminary

plat proposes a water budget with limited infiltration as the proposed method of treatment and disposal per SRSM requirements.

*f.* The developer will be responsible for all costs associated with constructing storm water improvements necessary to serve the proposed plat.

**WCE Response:** This comment is noted; however, if determined to be an area-wide or C.I.P. improvement, GFC waivers may be requested.

14. This plat will need to be incorporated into the SIA Water Pressure Zone. However, current water demands in this pressure zone are challenging the City's ability to supply water in accordance with engineering standards and regulations for fire flow. Thus, until an analysis of the City's water system in the West Plains Area is complete and needed improvements to the water system have been identified and addressed, all new connections to the water system must wait until the new SIA#3 Water Storage Tank, currently under construction, is complete and operational. The Tank is anticipated to be operational by the end of 2024. Connection to the water system may be allowed sooner, depending on conclusions from the water analysis and based on the amount of water requested and timing of the proposed development.

**WCE Response:** A water model has been prepared and the applicant is working with the City of Spokane on an amicable solution.

- a. Connecting this plat into the SIA Water Pressure Zone is a concept that has been discussed by City Staff and the developer. To implement this concept, the developer will be required to do the following:
- I. Install a closed valve into the existing 12" water main in Garden Springs Rd. just south of where Grandview's water main connects into Garden Springs. From this valve, a new 12" water main must be installed in Grandview, east to the intersection of 21Aveue and Grandview. At this intersection, a new Pressure Reducing Valve (PRV) assembly, connecting the two 12-inch mains, will need to be installed. This is where a new 8" water main from 21st will connect (See sketch). Since the existing 12-inch water main in Garden Springs from Abbott Road to Grandview will be converted from the Highland Pressure Zone to the SIA Pressure Zone, PRV's will need to be installed on any water services to existing houses not having one in the converted pressure zone. Valves at each end of the water mains in the pressure zone conversion will need to be adjusted (opened / closed) to complete the conversion.

WCE Response: This comment is noted.

b. The developer will be responsible for all costs associated with design and construction of water improvements necessary to serve the proposed plat.

WCE Response: This comment will be addressed during the construction phase.

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c. The water system shall be designed and constructed in accordance with City standards. A pressure of 45 psi minimum at the property line is required for service connections supplying domestic flows. Pressures shall not drop below 20 psi at any point in the system during a fire situation. Pressures over 80 psi will require that pressure reducing valves be installed at developer expense.

WCE Response: This comment will be addressed during construction of water utilities.

d. An electronic version (pdf) of an overall water plan and hydraulic analysis must be submitted to Development Services for review and concurrence. The hydraulic analysis must include supporting calculations for domestic and fire flows.

**WCE Response:** This comment is noted, a hydraulic analysis was submitted to the City of Spokane on April 18, 2023. The project and the water department are continuing to discuss options for service

e. In addition to the hydraulic analysis, construction plans shall be submitted to Development Services for review and acceptance. The water system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.

**WCE Response:** This comment is noted, a hydraulic analysis was submitted to the City of Spokane on April 18, 2023. The project and the water department are continuing to discuss options for service.

7. There is an existing 8" PVC sanitary sewer main in 21st Avenue at the "H" Street right of way intersection that may provide service to this plat.

**WCE Response:** This comment is noted and the development plans to connect to the existing 8" PVC sanitary sewer main in 21<sup>st</sup> Avenue once extended via the Alteration to the Westridge Plat.

a. The developer will be responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.

WCE Response: This comment will be addressed in the utility construction phase.

b. The sanitary sewer system shall be designed and constructed in accordance with City standards.

**WCE Response:** This comment will be addressed during the construction phase for utilities.

c. Construction plans shall be submitted to Development Services for review and acceptance. The sanitary sewer system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.

**WCE Response:** Construction plans will be sent to Development Services for review and acceptance.

8. Public streets, including paving, curb, sidewalk, signs, storm drainage structures/facilities, and swales/planting strips necessary to serve the proposed plat, shall be designed and constructed in accordance with City standards. Sidewalks shall serve each lot.

**WCE Response:** Public streets including paving, curb, sidewalk, signs, storm drainage structures or utilities, and swales or planting strips will be designed and constructed in accordance with City of Spokane standards to serve each proposed lot.

a. Signing and striping plans, where appropriate, shall be included as part of the design submittal.

**WCE Response:** Signing and striping plans will be included as part of design submittal where appropriate.

b. Street design for the plat shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.

**WCE Response:** This comment is noted. A geotechnical evaluation and boring/blasting analysis has been performed and will be made available as necessary.

- *c.* Any grades exceeding 8% must be shown on the preliminary plat. **WCE Response:** There are no street grades greater than 8%.
- *d.* Garages shall be a minimum of 20 feet from the back of sidewalk to fully accommodate a parked vehicle without obstructing the sidewalk.

WCE Response: Garages will be set back 20 feet from back of sidewalk.

e. All parking areas and driveways shall be hard surfaced. In accordance with the City of Spokane Municipal Code, Section 17H.010.220, the total nominal width of all driveways on a street for any one ownership shall not exceed forty percent of the frontage. An engineering design variance must be approved in order to allow larger approach widths. The application for the design variance must be accompanied by supporting information detailing why the 40% frontage requirement cannot be met.

**WCE Response:** The maximum driveway width of 40% of the frontage is a PUD element that the project is applying for an alteration to. A 40' lot would only allow for 16 feet of frontage at 40%. The proposed residences will have 2-car garages with a width of 20 feet; therefore, we would like to proceed with modifying the maximum driveway width for the proposed homesites as a PUD element.

- f. All street identification and traffic control signs required, due to this project, shall be installed by the developer at the time street improvements are being constructed. They shall be installed and inspected to the satisfaction of the City's Construction Management Office in accordance with City standards prior to the occupancy of any structures within the plat.
   WCE Response: This comment will be addressed prior to certificate of occupancy.
- g. The developer will be responsible for all costs associated with constructing street improvements necessary to serve the proposed plat.

WCE Response: This comment will be addressed during street construction.

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The following statements will be required in the dedication of the final plat:

9. Ten-foot utility and drainage easements, as shown hereon the described plat, are hereby dedicated to the City and its permittees for the construction, reconstruction, maintenance, protection, inspections and operation of their respective facilities together with the right to prohibit structures that may interfere with the construction, reconstruction, reliability and safe operation of the same.

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

- 10. Development of the subject property, including grading and filling, are required to follow an erosion/sediment control plan that has been submitted to and accepted by Development Services prior to the issuance of any building and/or grading permits.
   WCE Response: This comment will be addressed at time of final plat.
- 11. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private water system complying with the requirements of Development Services and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department and the Fire Department.

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

- 12. The City of Spokane does not accept the responsibility of maintaining the stormwater drainage facilities on private property nor the responsibility for any damage whatsoever, including, but not limited to, inverse condemnation to any properties due to deficient construction and/or maintenance of stormwater drainage easements on private property. WCE Response: This comment will be addressed at time of final plat.
- 13. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Storm water Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and, per the Project Engineer's recommendations, based on the drainage plan accepted for the final plat. Pre-development flow of off-site runoff passing through the plat shall not be increased (rate or volume) or concentrated due to development of the plat, based on a 50-year design storm. An escape route for a 100-year design storm shall be provided.

WCE Response: Please see the previous comments related to stormwater.

14. No building permit shall be issued for any lot in this plat until evidence satisfactory to the City Engineer has been provided showing that the recommendations of SMC 17.060 "Stormwater Facilities", the Regional Stormwater Manual, Special Drainage Districts, City Design Standards, and the Project Engineer's recommendations, based on the drainage plan accepted for this final plat, have been complied with. A surface drainage plan shall be prepared for each lot and shall be submitted to Developer Services for review and acceptance prior to issuance of a building permit.

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

- 15. Slope easements for cut and fill, as deemed necessary by Development Services in accordance with City Design Standards, are granted along all public right of ways.
   WCE Response: This comment is noted, easements will be placed at time of final design and platting.
- 16. Only City water and sanitary sewer systems shall serve the plat; The use of individual on-site sanitary waste disposal systems and private wells is prohibited.
  WCE Response: This comment will be addressed at time of final plat.
- 17. All public improvements (street, sewer, storm sewer, and water) shall be constructed to City standards prior to the occupancy of any structures served by said improvements.WCE Response: This comment will be addressed at time of final plat.
- 18. No building permit shall be issued for any lot in the plat until evidence satisfactory to the City Engineer has been provided showing that sanitary sewer and water improvements, constructed to City standards, have been provided to the lot in question.
  WCE Response: This comment will be addressed at time of final plat.
- 19. The development of any structures in this plat is subject to review of a geotechnical evaluation for foundation design to determine suitability and effects from stormwater and/or subsurface runoff. The geotechnical evaluation is required to be performed for each lot with structures and submitted for review and concurrence to the Development Services Center prior to issuance of a building permit.

**WCE Response:** Please provide a citation of where the building code or SMC requires a geotechnical evaluation of every lot prior to building permit, if not, a comprehensive geotechnical evaluation for the entire site with conditions for blocks of lots will be provided.

20. With respect to any increased stormwater flows accruing as a result of any development, each property owner, on its own behalf and the behalf of its successors in interest, fully accepts without reservation, the obligation to obstruct and artificially contain and collect all natural or artificially generated or enhanced drainage flows across or upon said owner's property. The purpose of this requirement is to avoid causing or potentially contributing to flooding, erosion or stormwater loads on other private or public properties and the public sewer system.

**WCE Response:** This comment does not seem to be consistent with SRSM requirements. If there is a separate requirement, please provide guidance from the SMC.

21. Each property owner, on its own behalf and the behalf of its successors in interest, acknowledges and accepts full responsibility to maintain drainage facilities within all drainage easements, and to maintain and protect any on-site stormwater control facilities. Under no circumstances does the City of Spokane, its officers or agents, accept any responsibility to maintain on-site stormwater control facilities, drainage courses or drainage pipes on private lots within this development or otherwise within drainage easements or flood plain areas.

WCE Response: As a PUD with an HOA and CC&Rs, this comment is noted.

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22. The City of Spokane is not a guarantor of public improvements with respect to protection of property from flooding or damage from stormwater, excessive groundwater levels, soil erosion, movement, or related risks. Property owners, acting on their own behalf and the behalf of their successors in interest and assigns, forever waive any claim for loss, liability, or damage to people or property because of stormwater or drainage problems and related risks against any governmental entity arising from platting or permit approvals, or the construction and maintenance of public facilities and public property within the plat or subdivision. This waiver is intended to include application to the City of Spokane, its officers and agents, and includes any claims for loss or for damage to lands or property adjacent to or otherwise affected by any street or public way or easement by the established construction, design and maintenance of said streets, not by way of limitation. Property owners, on their own behalf and the behalf of their successors and assigns, further stipulate and agree that this waiver decreases property value in an amount at least equal to one dollar or more and intend and agree that it run with the land.

**WCE Response:** This comment does not seem to be consistent with SRSM requirements. If there is a separate requirement, please provide guidance from the SMC.

23. All street identification and traffic control signs required by this project will be the responsibility of the developer per SMC 17G.080.070.

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

24. All parking areas and driveways shall be hard surfaced. All new or modified driveway locations will need to be reviewed and approved prior to construction.WCE Response: This comment will be addressed at time of final plat.

Integrated Capital Management (ICM) – Traffic Planning The following SEPA Mitigation and conditions of Plat Approval were provided by Inga Note via email on 06/06/2023 and reiterated in email dated 10/04/2023 (enclosed). SEPA Mitigation

- 25. The applicant shall construct sidewalk on the south side of Grandview Avenue from Garden Springs Road to 21st Avenue to provide a walking route for students to reach the school bus route on Garden Springs Road. The sidewalk shall be built concurrent with 21st Avenue or the first phase of street improvements within the Beard Addition PUD. The City has determined that the improvements qualify as public facilities for purposes of SMC 17D.075.070 and will otherwise serve the goals and objectives of the City's capital facilities plan and anticipates that the improvements will qualify for a credit against transportation impact fees under SMC 17D.075.070. Upon completion of the improvements, the applicant may apply for a credit pursuant to the process set forth in SMC 17D.075.070.
  - **WCE Response:** This comment is noted, additionally, the applicant understands that traffic impact fees will be paid at time of building fees.

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#### Conditions of Approval

26. 21st Avenue must be fully constructed and open to traffic between Grandview Avenue and the existing endpoint of 21st Avenue prior to issuance of any building permits within the PUD.

**WCE Response:** Prior to issuance of any building permits within the PUD, 21<sup>st</sup> Avenue will be constructed and open to traffic between Grandview Avenue and the existing endpoint of 21<sup>st</sup> Avenue.

#### WA State Dept. of Transportation:

The following comments need to be addressed prior to deeming the application technically complete per email from Greg Figg on October 5, 2023 (enclosed).

9. WSDOT has reviewed the submitted material for the above project. The comments below are in response to the September 14th WCE Engineers letter comments number 69 and 70 relating to WSDOT comments.

The proposed improvements to US 195 and 16th Ave are under design by WCE, however no agreement for their construction is in place nor has a bond been posted. It should not be assumed that these intersection improvements are in place as this has not yet been committed to. This intersection needs to be analyzed.

The Garden Springs I-90 Interchange westbound off ramp will be impacted by this development, it is true that the previous analysis of another project showed acceptable levels of service for this intersection. With the addition of the substantial project volume (88 AM Peak Hour Trips and 111 PM Peak Hour Trips) by this proposal WSDOT has no assurance that acceptable level of service will remain with this project in place. This intersection needs to be analyzed.

WSDOT requests that a traffic analysis be prepared given the location and size of this proposal to address the probable impacts on the transportation system including the above intersections.

**WCE Response:** WCE is of the opinion that a traffic study should not be required for this project as the project will pay impact fees, and a traffic study will cause unnecessary delay. It should be noted that several projects along US-195 have been delayed due to traffic study requirements for one to two years.

#### Washington State Department of Ecology:

27. Shorelands and Environmental Assistance Program:

Please note that this new information was not received in time for Ecology staff to comment on this new information prior to the agency comment deadline. In addition this new information does not match that submitted and included in the 2nd request for agency comment in response to the June 7 Technically complete letter.

For formal review by all agencies with jurisdiction, please submit any revised material to City of Spokane Planning for review as part of formally noticed request for comments. For more information, please contact Matt Fisher at 509-601-9546, or via email at Matt.Fisher@ecy.wa.gov.

WCE Response: This comment is noted.

#### WA department of Archeology and Historic Preservation:

The following additional information was forwarded with a concur with survey letter from Sydney Hanson at DAHP (see enclosed letter dated Jun 13, 2023).

## Conditions of Approval.

*A. Inadvertent Discovery Plan (IDP) be included prior to ground disturbing activities.* **WCE Response:** This comment is noted.

## Cheney School District:

*Please see email from Jamie Reed, Finance Director of Cheney Public Schools dated September* 24, 2023 (see also original correspondence on May 17, 2023, included in the June 7, 2023, Tech. Incomplete Letter).

The following comments are general in nature and appears to have been met via your separated sidewalk infrastructure proposal meeting current street development standards under the SMC. These comments were also forwarded to Spencer Gardner on September 25th, 2023, for consideration in long range planning efforts such as City of Spokane Comprehensive Plan updates.

- Please ensure the neighborhood includes safe walking\biking paths throughout the development, to ensure the ability to have a single central bus stop for school transportation.
- Currently there are no walking or biking paths OR public transportation from this development to connect to the nearest public schools, either Windsor Elementary School, or Westwood Middle school. This lack of access and transportation limits families abilities to connect with public education.
- The Elementary School serving the attendance boundaries this development falls within, is Windsor Elementary School. As of October 2022, Windsor Elementary School was 106% of its intended capacity.

\*\*noted graphic from our Cheney School Dist. current and projected facility utilization included in enclosed email).

WCE Response: These comments are duly noted.

## Spokane Transit Authority:

• Please see comments from Tara Limon and the Planning Response email from Melissa Owen dated 10/05/23 (prior STA email on 05/18/2023 and the Planning response included in June 7, 2023 Tech. Incomplete Letter). No corrections or modifications are required based on STA comments at this time.

Spokane Transit currently does not provide fixed route transit service to the project site. While there are no current plans for fixed route service to the project area, Grandview at Garden Springs may be a candidate for bus service in the future. Please identify prospective locations for future bus stops near Grandview at Garden Springs that can be added later in a way without dramatically altering stormwater swales or other features in the right of way. Please include sidewalks along both sides of the threat from this project to Garden Springs and Grandview. Please coordinate sidewalk plans to ensure an ADA boarding and alighting pad is adjacent to the roadway.

**WCE Response:** WCE has reviewed the comments from Melinda Rehfeldt and is generally in consensus with City of Spokane Planning's response. The project property owner does not own property at the intersection of Grandview and Garden Springs, and so would not be required to construct improvements at that intersection.

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#### Inland Power

• This development is not in Inland Power & Light's Service Territory per enclosed email dated 09/25/23.

WCE Response: This comment is noted.

Other Comments received from the public prior to the public comment period: Please note that public comments received during the agency comments will be included in the record for Hearing Examiner review. During the 2nd RFC, one new public comment was received. Please also refer to two emails received during the initial RFC – these were included in the June 7, 2023, Tech. Incomplete letter.

*Debbie Rosengrant (see enclosed email dated 05/19/2023 and follow-up email related to Beard/Alteration of Westridge Addition PUD)* 

• With the Beard Addition there is going to be a considerable increase in the flow of traffic to this area and to Mention Again this road is Continuing to go through Private Property. Also, with the 2 houses built on the East end of Grandview Ave 3604 & 3608 W G-View the Rock that is currently in the ROW is a danger & impedes the flow of traffic. Was also asking would the WSDOT have looked at this area for Traffic Safety concerns ? Lastly, did the city consider asking Jim Frank & Lennar NW if they together would work with the City to Develop the Grandview - Hst Realignment ? It looks like it was mentioned that developers William Nascimento & George Paras have agreed to construct - complete the improvement at 16th & US 195 which is a concern mentioned along with this Development.

**WCE Response:** This comment is noted. WCE is aware that H Street continues through the property of Ms. Rosengrant. We do not expect this project to rectify this issue, it can be remedied by Ms. Rosengrant at any time by building out that portion of H Street and Grandview Avenue as was previously approved in the original Westridge PUD project, now defunct. Please note that any property owner/s adjacent to H Street can at any time of their own volition construct the improvements to H Street as part of their ownership and the approved plans from the previous action. As a new application that is not adjacent to H Street, there is no rational nexus for this project to make those improvements.

#### City of Spokane Treasury:

• No LIDS per treasury review by Chris Johnson (email dated 05/05/2023) WCE Response: This comment is noted.

#### City of Spokane Streets:

• The Street Department has reviewed the document(s) and has no comments at this time. The attached document is a request for separate signing and striping drawing(s) with landscaping at the time of construction permit submittals. See email from Bobby Halbig on 05/17/2023.

**WCE Response:** This comment is noted, please see responses to Bobby Halbig located elsewhere in this letter.

#### City of Spokane Fire Protection Engineer:

No comments received during 2nd RFC; however, based on the applicant response letter dated September 14, 2023, the following items have been addressed (see content from Dave Kokot via

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email dated 05/18/2023 included in the June 7, 2023, Tech. Incomplete letter and WCE response below).

The following items require correction prior to deeming the application technically complete. See email form Dave Kokot dated 05/18/2023.

Revisions Required.

28. The plans do not show the grade of the access streets. There are several locations in which it appears to exceed 10%.

WCE Response: No street grade exceeds 8% in this preliminary plat.

29. Hydrants are not shown along 21st, and it appears that an additional hydrant is needed on Westridge Ln south of 21st to meet the 500' max distance between fire hydrants.

**WCE Response:** The 21<sup>st</sup> Avenue Plat Alteration project to the north of this subdivision has a fire hydrant located at the southwest corner of the intersection of Westridge Lane and 21<sup>st</sup> Avenue.

## City of Spokane Waste Management:

• Solid Waste Collection will review to make sure streets are built to city standards and refuse will be properly screened from view on non-collection days (see email from Kerry Deatrich dated 05/18/2023).

**WCE Response:** This comment will be addressed upon review of the streets by Waste Management.

City of Spokane Integrated Capital Management:

Corrections required.

Note: Initial corrections noted as "required by ICM" via email from Marsha Davis on 05/18/2023 and follow-up with Engineering on 06/01/2023 have been removed/modified due to revisions to water-related comments now included in the enclosed October 18, 2023, Engineering Memo.

General Comments to be addressed prior to final plat approval.

Note by M. Owen: Per a following-up conversation with Eldon Brown on 06/07/2023, the below Sewer Comments are general in nature and will need to be addressed at item of engineering plan review and prior to final plat approval.

SEWER:

30. The sewer system has adequate capacity.

WCE Response: This comment is noted.

31. It appears that that the western portion of the development is too low in elevation to meet minimum slope and connect to the sewer at the end 21st Avenue. The Developer needs to provide solutions to eventually gravity drain into the city's public sewer system. If a Lift Station is proposed, then it would likely be a Private Lift Station or individual pumps for each home.

**WCE Response:** This comment is noted; however, the western portion of the site postgrading will meet minimum elevations to connect into the sewer at the east end of  $21^{st}$ Avenue. Please see the attached preliminary profiles.

WA Department of Fish and Wildlife:

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#### Corrections Required.

32. No new comments were received from Fish and Wildlife during the 2nd Request for Agency comment however, it appears that the proposed trail within the wetland buffer is still too wide and needs to be reduced to 5' width where the trail is located in the outer 25% of the wetland buffer. This correction has been noted by planning above and are required to be address prior to deeming the application Technically Complete.

Please refer to email communications with general comments regarding the proposed wetland modification submitted by Kile Westerman as needed (email dated 05/15/2023 and included in the June 7, 2023, Tech. Incomplete letter).

**WCE Response:** This comment is noted; however, the recent changes to the wetland buffer have placed the trail outside of the buffer.

Spokane Tribe of Indians, Tribal Historic Preservation Officer:

Conditional Approval.

An Inadvertent Discovery Plan implemented into the scope of work. This condition of approval is required to be address prior to any ground disturbing activities and will be included as a condition of approval for the PUD Plat and Wetland Modification CUP per correspondence from Randy Abrahamson (email dated 05/17/2023).

**WCE Response:** A Cultural Resource Survey was submitted to the City of Spokane on May 10, 2023, with no historical or archaeological remains found. Regardless of this finding, an Inadvertent Discovery Plan will be implemented into the scope of work noting if any artifacts or human remains are discovered onsite, construction will cease and the City and Tribe will be notified.

#### Grandview Thorp Neighborhood Council:

• No new communications received during 2nd request for agency review. Please see the email submitted on behalf of Joy Sheikh, Chair of Grandview Thorp Neighborhood Council on 05/17/2023 enclosed in the June 7, 2023, Comment Letter)

**WCE Response:** Please see the response letter from WCE dated 9-14-23 for the response to these items.

#### WA state Department of Ecology:

No new comments received from WA Dept. Of Ecology Water Quality or Water Resources Program during the 2nd Recipes see the entirety of the WA Department of Commerce comment submittal from Cindy Anderson Dated May 18., 2023 included in the June 7, 2022023,ch. Incomplete Letter.

Generally, Ecology provided standard language regarding their Hazardous Waste and Toxics Reduction Program, Water Quality Program, etc. Should you have questions about information presented in the Ecology comment letter, please feel free to reach out to Cindy Anderson at (509) 655-1541 or via email at Cindy.Anderson@ecy.wa.gov.

Corrections required.

33. Shorelands and Environmental Assistance Program:

Wetlands Based on National Wetland Inventory imagery and aerial photos, it appears that the wetland delineation performed on June 15, 2022, may have underestimated the extent of wetlands on this project site. Washington Department of Ecology requests an opportunity to visit the site and confirm the wetland boundaries, as shown in the SEPA document attachment entitled

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"Wetland Assessment and Mitigation Report" dated August 10, 2022. Impacts to wetlands will require review and permitting from the Department of Ecology and may require permitting from the U.S. Army Corps of Engineers and the local government.

For more information, please contact Matt Fisher at 509-601-9546, or via email at Matt.Fisher@ecy.wa.gov.

**WCE Response:** WCE and the project biologist spoke with Matt Fisher and determined that the current delineated wetlands are correct. It is our understanding that this item has been resolved, please see the attached email from Matt. Additional mitigation measures are being resolved at this time.

## 34. Water Quality Program:

Operators of construction sites that disturb one acre or more total area and has or will have a discharge of stormwater to a surface water or to a storm sewer, must apply for coverage under Department of Ecology's Construction Stormwater General Permit.

If soil or ground water contamination is known at the site, additional information will be required. The applicant will be required to submit additional studies and reports including, but not limited to, temporary erosion and sediment control plans, a stormwater pollution prevention plan, a site map depicting sample locations, a list of known contaminants with concentrations and depths found and other information about the contaminants.

Application should be made at least 60 days prior to commencement of construction activities. Please access the permit application and related documents online.

For more information, please contact Suman Paudel at (509) 601-2124 or via email at Suman.Paudel@ecy.wa.gov.

**WCE Response:** This comment is noted and will be implemented at time of construction and after plans are approved.

#### 35. Water Resources Program:

Dam Safety Program Under RCW 90.03.350, a Dam Safety construction permit is required for those dams or ponds that can impound a volume of 10 acre-feet or more of water or other liquids above ground level. The Beard Addition Preliminary PUD Long Plat project references the construction of stormwater detention ponds, if any of the impoundments meet or exceeds the above referenced criteria you will need to apply for a dam construction permit. To determine if a Dam Safety construction permit is required for your project, the applicant must submit a set of construction plans to:

WA Department of Ecology Dam Safety Office P.O. Box 47600 Olympia, WA 98504-7600

For more information, please contact Charlotte Lattimore by e-mail at Charlotte.Lattimore@ecy.wa.gov or by telephone at (360) 407-6066.

**WCE Response:** This project does not intend to impound 10 acre-feet or more of water or other liquids above ground level.

Spokane Regional Emergency Communications:

No new comments received during 2nd RFC.

Joe Sacco, GIS Manager with the Spokane Regional Emergency Communication has noted that his comments regarding road naming were sent to Erik Johnson with City DSC Engineering for

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review and coordination. Any necessary road naming comments will be provided by the City of Spokane Engineering Department. Email dated 05/18/2023 included in June 7 Tech. Incomplete Letter).

Cumberland and Beard pose no issues and the numbered avenues are in good alignment. I'm not sure I understand the use of Westridge Ln and St... are those intended to dead end into each other and just those 6 or 7 northern most lots will be accessed by a private roadway? Also, Westridge is not a great street name for 911. Using a directional as part of a street name lends to easy confusion when conveyed verbally from a 911 caller. Westridge Ln sounds the exact same as W Ridge Ln (callers inconsistently provide prefix directions and street types), or we may not know if Westridge is one word or two. It also causes issues with the location verification process, as those tools interpret north, south, east and west first as prefix directions, not as part of the name. These types of issues almost always slow the dispatching process down. For these reasons, and other even more boring ones, it is explicitly prohibited in the municipal code.

**WCE Response:** This comment is noted. Please see the attached preliminary plat for the updated roadway name of "Snowcrest Street".

## Spokane Transit Authority:

• Please see comments from Tara Limon dated 05/18/2023 and the Planning response email from Melissa Owen on 05/25/2023. No corrections or modifications are required based on STA comments at this time.

WCE Response: This comment is noted.

## Avista:

No new comments received from Avista however, based on the applicant response letter dated September 14, 2023, the following items will be addressed and included on the final plat. See letter from Larissa Pruitt dated 05/19/2023 enclosed in the June 7, Technically Incomplete Letter.

Corrections required.

36. Please provide a 10' wide dry utility easements along the front of each lot.WCE Response: This comment is noted and will be included on the final plat.

The following dedication language on the face of the plat:

37. Easements for "Dry" utilities as shown hereon are hereby granted over the rights-of-way for the private streets and adjoining said streets to the City of Spokane and its permitted serving utilities for the construction, reconstruction, maintenance, protection, inspection and operation of their respective facilities, together with the right to prohibit changes in grade over installed underground facilities and the right to prohibit, trim and/or remove trees, bushes, landscaping, without compensation and to prohibit brick, rock or masonry structures that may interfere with the construction, reconstruction, reliability, maintenance, and safe operation of same.

WCE Response: This comment is noted and will be included on the final plat.

38. Storm drain dry wells and Water Meter boxes shall not be placed within the "Dry" easements; however, lateral crossings by storm drain, water and sewer lines are permitted.
WCE Response: This comment is noted and will be included on the final plat.

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*39.* Serving Utility companies are also granted the right to install utilities across future acquisition areas or border easements.

WCE Response: This comment is noted as a requirement by utility companies.

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

Sincerely,

Myth Q Eule

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

Encl: Updated preliminary plat

CC: Sponsor File