



Whipple Consulting Engineers, Inc.

October 16, 2023

WCE No. 2023-3345

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

Attn: Melissa Owen, Assistant Planner

**Re: Response to Determination of Incompleteness
Red Band Preliminary Short Plat– A Residential Subdivision**

Dear Ms. Owen:

This letter is to confirm receipt and response to the determination of incompleteness for the Red Band Preliminary Short Plat, City of Spokane file number Z23-117PSP. For clarity, City of Spokane comments are left aligned below in italic type, and our responses are indented in roman type (upright).

Planning:

- 1. The response letter notes an attached Geotechnical Evaluation to address codes compliance with Geologically Hazardous Zones. This document does not appear to have been included with the response materials. Please submit a copy of the reference report for review.*

WCE Response: The geotechnical evaluation for the project was submitted to Melissa Owen on September 25, 2023.

- 2. The response letter references a copy of a Cultural Resource Survey to address comments from Randy Abrahamson, Spokane Tribe of Indians Historic Preservation Officer (STHPO); however, the submittal does not appear to have included the submittal. Please submit a copy of this survey for review by Randy Abrahamson.*

WCE Response: The cultural resource survey for the project was submitted to Melissa Owen on September 25, 2023.

- 3. Please include setbacks from the existing structure on proposed lot 1 to adjoining lots (setbacks to shared lot line with proposed lots 2 and 3). Dimensions included on the revised site plan includes only the dimension from the new structure on proposed lot 1 to the adjoining lot to the east that is not part of this application.*

WCE Response: Setbacks from the existing structures on proposed lot 1 to adjoining lots have been included in the revised site plan.

4. Please remove the “proposed CB-55 delineation line from sheet PP1. This platting action does not modify the zoning designation or development requirements associated with each zone. Please retain the dashed line indicating the location of each zone based on the city’s zoning maps.

WCE Response: The “proposed CB-55 delineation” line has been removed from Sheet PP1.

Conditions of Approval:

- I. Street trees will be required along all existing and proposed new public rights of way. An updated street tree plan addressing all required street trees – including those associated new public cul-de-sacs – will be requested at time of your engineering plan submittals prior to approval of the final plat. On-site landscaping will be reviewed as part of the building permit associated with development of individual parcels.

WCE Response: An updated street tree plan will be submitted at time of engineering plan submittal.

- II. Please provide a draft copy of the required perpetual shared use/access agreement for any shared facilities such as parking, stormwater, access, etc. as part of your civil plan submittals. Review, approval, and recording as appropriate will be required prior to approval of civil plans. Any separate recorded agreements will also need to be referenced on the face of the final plat.

WCE Response: A draft copy of the perpetual shared use/access agreement for shared facilities will be submitted prior to final plat approval.

Preliminary Plat General Comments:

- i. Build-out of the site/lots including compliance with development standards for CB and RHD zones based on the zoning designation of the particular lot. Proposed lot 3 includes both CB and RHD zones as denoted on the revised site plan. Please note that any buildings/uses proposed entirely within a specific zone will be reviewed based on that zone. Building/Uses proposed across the zoning boundary will be evaluated for compliance with the most restrictive zone (see 17A.040.010 and 17A.040.050).

WCE Response: This comment is noted.

- ii. Compliance with requirements associated with Geologically Hazardous Areas (17E.040) will continue to be reviewed throughout the platting and development process.

WCE Response: Compliance with geologically hazardous areas will be reviewed through the platting and development process.

- iii. Compliance with all applicable development standards will be verified at time of permit.

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

- iv. We recommend that you submit your final plat materials at the time of submittal of engineering plans for infrastructure development in order to avoid conflicts across plans.

While the final plat will not be approved until infrastructure improvements are completed and accepted by the City of Spokane, the review process can take place concurrently.

WCE Response: This comment is noted and will be addressed at time of engineering plan/final plat if submitted concurrently.

- v. *Final Short Plat Map Requirements (Please see SMC 17G.080.040 F thru I and SMC 17G.080.050 H and 17G.080.070 B thru F for more detail as needed). A final short plat shall be submitted in the same form and with the same content as the preliminary short plat with the following exceptions or additional requirements:*
- a. *A final short plat shall contain all the information required of the preliminary plat, except the following:*
- i. *Show existing buildings.*
- ii. *Show existing utility lines and underground structures.*
- iii. *Show the topographical elevations; or*
- iv. *Contain the names and addresses of adjoining landowners.*

WCE Response: The final short plat will not include existing buildings, utility lines and underground structures, topographical elevations or contain the names and addresses of adjoining landowners as noted in SMC 17G.080.040(G)(1).

b. The drawing shall:

- i. *be a legibly drawn, printed or reproduced permanent map;*
- ii. *if more than one sheet is required, each sheet shall show sheet numbers for the total sheets;*
- iii. *have margins that comply with the standards of the Spokane county auditor;*
- iv. *show in dashed lines the existing plat being replatted, if applicable;*
- v. *show monuments in accordance with SMC 17G.080.020(H)(1);*
- vi. *include any other information required by the conditions of approval; and*
- vii. *include any special statements of approval required from governmental agencies.*
- vi. *The final plat shall include the signatory statements as prescribed in SMC 17G.080.040(G)(2) including the following:*

a. Surveyor's certificate, stamp, date and signature, as follows:

The following land surveyor's certificate to be shown on each sheet of the plat: "I, _____ registered land surveyor, hereby certify the plat of _____, as shown hereon, is based upon actual field survey of the land described and that all angles, distances, and courses are correctly shown and that all non fronting lot corners are set as shown on the plat. Monuments and fronting lot corners shall be set upon completion of the utility and street improvements.

Signed _____(Seal)"

b. A certification by the city treasurer, as applicable:

"I hereby certify that the land described by this plat, as of the date of this certification, is not subject to any local improvement assessments. Examined and approved, this _____ day of _____, 20____.

City of Spokane Treasurer"

The certification by the planning director, as follows:

“This plat has been reviewed on this _____ day of _____, 20__ and is found to be in full compliance with all the conditions of approval stipulated in the Planning Director’s approval of the preliminary plat # Z22-478PSP.

City of Spokane Planning Director”

c. *The certification by the city engineer, as follows:*

“Approved as to compliance with the survey data, the design of public works and provisions made for constructing the improvements and permanent control monuments this _____ day of _____, 20__.

City of Spokane Engineer”

d. *The certification by the Spokane county treasurer, as follows:*

“I hereby certify that the land described in this plat, as of the date of this certification, is not subject to any outstanding fees or assessments. Examined and approved _____ day of _____, 20__.

Spokane County Treasurer”

e. *The certification by the Spokane county auditor on each page of the final short plat including the time, date, book and page number of the recording of the final mylar.*

f. *Signature of every owner certifying that:*

- i. *the plat is made with the free consent and in accordance with the desires of the owners of the land;*
- ii. *the owners are the owners of the property and the only parties having interest in the land and is not encumbered by any delinquent taxes or assessments;*
- iii. *the owners adopt the plan of lots, blocks and streets shown;*
- iv. *owner dedicates to the City and the City’s permittees the easements shown for utilities and cable television purposes.*

WCE Response: The final short plat map will follow all requirements listed in SMC 17G.080.040(G)(2) as described above.

The following statements will be required in the dedication of the Final 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: The above statement will be included in the dedication of the final plat.

Transportation (Inga Note):

Items to be addressed prior to Preliminary Plat Approval.

5. *It appears that there is sufficient road width to modify and/or add the proposed turn restricting curbs at both cul-de-sacs. For the curbing at proposed Elliot Place, shift the lane lines on the east and west ends to make space for the 2’ curb in the center. This will narrow the Whistalks Way travel lanes to the 10.5’ to 11.5’ range.*

WCE Response: The curbing of Fisher Ct. (Elliot Place) has been shifted to make space for a 2’ curb in the center.

6. *Please revised the proposed Red Band Place cul-de-sac to include a dedication of ROW to allow for a future road stub to the east into the adjacent SFCC property.*

WCE Response: The curbing of Fisher Ct. (Elliot Place) has been shifted to make space for a 2' curb in the center.

Note from M. Owen: Planning recommends that those portions of proposed Tract A to the south of the requested right of way be added to proposed lot 8 in order to retain the maximum number of lots under a final short plat. Depending on how who the above transportation comment is addressed the site data table and lot/tract detail will need to be updated to reflect changes for the impacted lot/tract. If this suggested solution is not feasible for this development please work with planning and engineering on an alternative solution to retain the total number of lots and tracts at a total of nine (9).

WCE Response: Tracts have been removed from the preliminary plat.

Conditions of Approval:

- IV. *The City's Bicycle Master Plan calls for a shared-use pathway along the frontage of Whistalks Way and any approval of this preliminary plat is conditioned upon implementation of the shared use path along Whitstalks Way (M. Owen Note: Please be advised that this facility will also be identified as mitigation under SEPA).*

WCE Response: A proposed path is shown along Whistalks Way on sheet PP1 of the preliminary plat.

Preliminary Plat/General Comments.

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

- i. *Parcels 6, 7 and 8 should have internal pathways connecting their buildings to the Whistalks Way pathway (Note from M. Owen: Compliance with applicable codes related to pedestrian connections will be evaluated by the Development Services Center at time of permit.).*

WCE Response: Lots 6-8 will contain pathways from each building to the Whistalks Way pathway.

- ii. *City's impact fees are assessed at time of permit application for building permit. The fee assessed under SMC 17D.075 will be those in place at time of permit application and collected prior to the issuance of building permit for the affected lot. There is a possibility for impact fee reductions if covered bicycle parking is provided as part of new development (Note from M. Owen: Parking requirements including applicable bicycle parking will be evaluated by the Development Services Center at time of permit along with any applicable fee reductions that may be available at time of permit for construction.).*

WCE Response: This comment is noted, city impact fees will be addressed at the time of building permit application.

Engineering (Erik Johnson, memo dated 09/14/23:

Items to be addressed prior to Preliminary Plat Approval.

7. *The City of Spokane has reviewed the provided Sewer & Water Analysis and has the following response.*

a. *No direct sewer connections will be allowed to the main in Whistalks Way. Connections must tie into the pump stations on either side.*

WCE Response: The project has been revised to connect to the pump stations instead of the sewer main in Whistalks Way.

b. *Please provide Engineering with an updated conceptual water & sewer layout.*

WCE Response: Concept sewer and water plans are indicated on Sheet PP4.

8. *Please update the preliminary plat to show Red Band Place renamed as Red Band Ct.*

WCE Response: Red Band Place has been renamed to Red Band Court.

9. *Please update the preliminary plat to show Elliott Place renamed to another name not already in use. Please use Ct and the roadway type.*

WCE Response: Elliott Place has been renamed Fisher Court.

Preliminary Plat/General Comments.

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

iii. *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 at the time of construction.

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

WCE Response: This comment will be addressed at the time of construction.

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: This comment will be addressed at the time of final plat submittal.

d. *The City of Spokane does not allow sanitary sewer lines to cross property lines unless the sanitary sewer system is private and located in easements.*

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

e. *If the sanitary sewer system is private, it shall be operated and maintained by a Homeowners Association, or like entity, qualified to perform said services.*

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

iv. *All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Stormwater Facilities", the Spokane 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 will be addressed at the time of final plat submittal.

- f. *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 Spokane 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.*

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

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

WCE Response: This comment will be addressed prior to construction.

- h. *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: This comment will be addressed prior to construction.

- i. *If drywells are utilized, they will be tested to insure 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 will be addressed at the time of final plat submittal.

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

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

- k. *The stormwater system shall be designed and constructed in accordance with City standards.*

WCE Response: This comment will be addressed at the time of construction plan submittal.

- l. *Construction plans shall be submitted to Development Services for review and acceptance.*

WCE Response: This comment will be addressed at the time of construction plan submittal.

- m. *The City of Spokane does not allow stormwater lines to cross property lines unless the stormwater system is private and located in easements.*

WCE Response: This comment is noted.

- n. *If the stormwater system is private, it shall be operated and maintained by a HOA, or like entity, qualified to perform said services.*

WCE Response: This comment is noted.

- v. *The developer will be responsible for all costs associated with constructing street improvements necessary to serve the proposed plat.*

WCE Response: This comment is noted.

- o. *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.

- p. *All street identification and traffic control signs required due to this project must 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 at the time of final plat submittal.

- q. *Construction plans shall be submitted to Development Services for review and acceptance.*

WCE Response: This comment will be addressed at the time of construction plan submittal.

- r. *Where the interior roadway network crosses parcels, a mutual use and access agreement will be required. The roadways must be operated and maintained by a HOA, or like entity, qualified to perform said services.*

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

- vi. *A 12-inch ductile iron and cast iron water distribution main in Whistalks Way is available to serve the project, as well as a 12-inch ductile iron main in River Ridge Boulevard.*

WCE Response: This comment is noted, please see the preliminary plat for the .

- s. *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 pressure relief valves installed at developer expense.*

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

- t. *An electronic version (pdf) of an overall water plan and hydraulic analysis must be submitted to the Development Services Center for review and concurrence. The hydraulic analysis must include supporting calculations for domestic and fire flows per City of Spokane Design Standards.*

WCE Response: A PDF water plan and hydraulic analysis will be submitted to the Development Services Center for review and concurrence.

- u. *In addition to the hydraulic analysis, construction plans shall be submitted to the Development Services Center 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 will be addressed prior to final plat recording.

- v. *The City of Spokane does not allow water lines to cross property lines unless the water system is private, located in easements, and master metered at the nearest public right of way line.*

WCE Response: A private water system is proposed for this subdivision, with water lines in the access and utility easement located on the south end of the property that will connect to Whistalks Way.

- w. *If the water system is private, it shall be operated and maintained by a HOA, or like entity, qualified to perform said service.*

WCE Response: The water system will be owned and operated by a HOA or like entity.

- vii. *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: This comment will be addressed at the time of construction plan submittal.

- viii. *Plan review fees for sanitary sewer, water, street, and stormwater improvements will be determined at the time of plan submittal and must be paid prior to the start of review.*

WCE Response: This comment will be addressed at the time of construction plan submittal.

- ix. *The preliminary plat references easements to be recorded in separate AFN's. Easements will need to be established by the final plat or recorded separately and the AFN referenced on the final plat.*

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

- x. *Comments regarding the signalized intersection, access onto Whistalks Way, the shared-use pathway, and other traffic/transportation items will be provided by others.*

WCE Response: This comment is noted.

Streets (Bobby Halbig):

Streets comments are general in nature and intended to provide guidance during the platting and site development process

- xi. *Please see enclosed memo from Bobby Halbig dated September 14, 2023 (M. Owen Note: These comment will be addressed at time of engineering plan review as applicable based on the final layout of lots, access, etc).*

Sheet PP2

1 Per SMC 17G.010.230 (provide separate Signing and Striping Plan). The following application materials are required as a part of an engineering services private project application.

a. (C) Public Street System (1) Prior to design approval, the following information is required:

i. Signing, striping and channelization plan approved by the transportation dept.

2 Move all signing and striping references from C2.1 to Signing and Striping Plan.

3 Use sign symbols shown in City of Spokane Design Standards.

4 Add Signing and Striping General Notes (attached) to Signing and Striping Plan.

5 Show all street trees on the Signing and Striping plan, so that obstructions can be dealt with in the design process.

a. "Developer Services and Planning staff will ensure trees and signs are shown on the same plan set for review" (Ordinance C36186).

6 Per SMC 12.02.0203, existing and proposed trees which obstruct traffic signs must be removed or relocated.

7 Additional comments attached and in file permit set.

Sheet PP2

8 Island will need to be a minimum of 2ft wide.

9 Island will need to be 9 inches tall with yellow Type 2 Channelizers, spaced 25ft apart.

10 Do not install "No Left Turn" signage.

11 Do not install right turn arrow.

12 Install street head and "Right Turn Only" signage at proposed stop sign location.

13 Install "No Parking – Fire Lane" signage within cul-de-sac.

14 Connect rail to both sides of ADA ramps at signalized intersection.

Sheet PP3

15 PP2 notes for west cul-de-sac.

16 East cul-de-sac: Left turn pocket length needs to be designed with modeling software so that queue blocking on Whistalks Way does not occur.

17 East cul-de-sac: Do not install pavement marking arrows.

18 East cul-de-sac: Install street head and "Right Turn Only" signage at proposed stop sign location.

19 East cul-de-sac: Install "No Parking – Fire Lane" signage within cul-de-sac.

20 East cul-de-sac: Proposed pavement markings shall be thermoplastic.

21 East cul-de-sac: Install white Type 4 Channelizer on east end of extended island.

22 East cul-de-sac: Show more of Whistalks east of Red Band Pl. Dimension all travel lanes.

23 East cul-de-sac: Striping at entrance to turn pocket will need to be removed (water-blasting only)

WCE Response: WCE has reviewed the comments received in the enclosed memo from Bobby Halbig and agrees that these comments refer to engineering plan review and are not applicable to the preliminary plat.

Spokane Transit Authority (STA):

See email from Melinda Rehfeldt dated September 1, 2023 (M. Owen Note: Comments from STA will be addressed outside this platting action).

- xii. *Spokane Transit currently has a bus stop pair at the intersection of Whistalks Way at Randolph Rd. Please coordinate with Spokane Transit to improve this bus stop with an ADA boarding and alighting pad.*

WCE Response: This comment will be addressed prior to construction plan submittal.

- xiii. *The City of Spokane will need to review and approve these bus stop improvements. Please coordinate with Melinda Rehfeldt at mreinfeldt@spokanettanist.com or (509)343-1692. Spokane Transit's bus stop standards are located here, Bus Stop Design Standards - Spokane Transit Authority.*

WCE Response: This comment will be addressed prior to construction plan submittal.

- xiv. *To help facilitate access to transit keep sidewalks clear during construction to allow safe and accessible access to the pedestrian network.*

WCE Response: This comment will be addressed during construction.

Department of Ecology:

xv. *Please see enclosed letter dated September 13, 2023, with Water Quality Program and General SEPA information (M. Owen note: This letter appears to be the same/similar to the letter previously submitted by WSDOE).*

Ecology acknowledges that the applicant will obtain a Construction Stormwater General Permit.

WCE Response: This comment will be addressed prior to land disturbing activities.

Spokane Tribe of Indians:

The following comment will need to be addressed prior to any ground disturbing activities or determining the application technically complete (M. Owen note: As identified by planning above, it does not appear that the referenced cultural resource survey was included in the response materials. Please forward the survey to the City for review by Randy Abrahamson. Please note that conditions placed on plat approval such as an Inadvertant Discovery Plan, etc. typically become mitigations for SEPA).

11. *09/05/23 Recommendation: Cultural survey completed, and Inadvertent Discovery Plan (IDP) implemented into the scope of work. Once the survey is completed, we will do more mitigation of the outcome of the cultural survey. However, if any artifacts or human remains are found upon excavation activity this office is to be notified and the immediate area cease. Should additional information become available, or scope of work change our assessment may be revised.*

WCE Response: A Cultural Resource Survey was sent to Melissa Owen on September 25, 2023.

Urban Forestry (Becky Phillips)

The below comments are based on codes in place at time of review of the preliminary plat and concept planting plan (M. Owen Note: The following comments will need to be addressed at time of development of public infrastructure or building permit for each lot as appropriate).

- xv. *Due to high conduction overhead power lines, please choose a Class I tree species for the south side of Whistalks Way. Urban Forestry does not recommend Hawthorne for this location, especially near the intersections as they are too wide and create obstructions for motorists and pedestrians and will require frequent clearance pruning*

WCE Response: This comment will be addressed in the landscape plan.

- xvi. *Verify all Class I trees are spaced 25' OC.*

WCE Response: This comment will be addressed in the landscape plan.

- xviii. *All interior streets that are public streets will require street trees as well.*

WCE Response: This comment will be addressed in the landscape plan.

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

CC: Sponsor
File