



Whipple Consulting Engineers, Inc.

June 5, 2023

WCE No. 2022-3345

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

Attn: Melissa Owen, Associate Planner

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

Dear Ms. Owen:

This letter is to confirm receipt and respond 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 listed below and in italic type, and our responses are left aligned and in roman type (upright).

Comments requiring addressing:

Transportation

- 1. If this project intends to tie into the signal at Whistalks/Elliot Drive, please analyze the phasing and the layout. Allowing the East bound and west bound lefts without turn pockets can lead to T-bone crashes between left and through vehicles that we often see on 4-lane roads. The city does not want to split phase the major movements either, so if you want full access there it will likely require widening Whistalks Way to fit in a turn lane. We probably could provide all the exiting movements, and EB right turns, it's just the WBL to enter the site that would be problematic. Maybe it could be an exit only and the inbound movements would be handled by other driveways?*

WCE Response: The plan has been revised and is not proposed to connect to the signalized connection on Whistalks Way.

- 2. The city is concerned about the short distance between Whistalks and Red Band Way. Outbound vehicles could block the T while waiting for the signal to turn green and blocking the movement of inbound traffic. The layout that was proposed in the West Hills Neighborhood Plan had the units fronting Whistalks with the road behind. Don't know if that's a legitimate option or not. Here the link to the plan. <https://static.spokanecity.org/documents/business/planning/neighborhood/final-westhillsplan-ft-george-wright-drive-sc-plan.pdf>*

WCE Response: The plan has been revised and is not proposed to connect to the signalized connection on Whistalks Way.

Streets:

1. *Please show the required pedestrian/bike trail along the frontage of Whistalks Way to ensure the existing roadways will accommodate it.*

WCE Response: This comment is noted. Please see the preliminary plat and street tree plan for the updated pedestrian/bike trail. Please note that the trail has been moved away from the existing utility poles and sewer.

2. *The west entrance/exit on Whistalks Way does not work geometrically. vehicles from the development are parallel to Whistalks Way and will face each other as they wait for signal to change since there is no perpendicular storage space. This will require signals to be placed in the development and be timed in a non-conventional manner causing major delays to the other mainline traffic. Exiting and entering vehicles will be required to make U-turns.*

WCE Response: The plan has been revised and is no longer proposed to connect to the signalized connection on Whistalks Way.

3. *Left turn pockets need to be added to Whistalks way along with perpendicular storage. The east-west streets intersecting the access street need to be near the south property line.*

WCE Response: A left turn pocket has been added to the center turn lane on Whistalks Way.

Engineering:

1. *Provide water and sanitary sewer capacity analyses (including peak hour demands, max day demands, average flows and fire flows) as part of the submittal for this project.*

WCE Response: See attached Red Band Apartments Water & Sewer Analysis.

- a. *The sewer system analysis needs to address capacity in both the River Run Lift Station and the gravity sewer / siphon in Whistalks Way to determine what improvements, if any, will be required and where connections will be allowed. Flow to the siphon cannot exceed the capacity of one barrel of the siphon.*

WCE Response: See attached Red Band Apartments Water & Sewer Analysis.

- b. *The analysis must verify there is existing storage capacity in the Lift Station and a concept design if additional storage is needed. The rate of discharge from the Lift Station is limited due to capacity limitations in the gravity sewer / siphon it discharges to in Whistalks Way.*

WCE Response: Per the Holy Names sewer lift station report the existing siphon system is determined to have 45 gpm of additional availability out of the 600 gpm. These 45 gpm accounts for the River Run lift station expansion that would discharge 180 GPM discharge to the siphon.

Based on review of the April 26th, 2013 Taylor Engineering and March 17th, 2006 River Run PUD Siphon Headworks Relocation Letter we believe that the 0.340 gpm per unit number is too high and not indicative of apartment units as the Holy Names peak flow data provide by the City of Spokane in October 13th of 2016 used a 0.218 gpm per unit number, which was

subsequently used for the Holy Names study, which is at 120 gpm currently. Therefore, $180 - 120 = 60 \text{ gpm} + 45 \text{ gpm} = 105 \text{ gpm}$ available.

Using the above-mentioned 0.218 gpm per unit amount we should be able to discharge 96+/- units to the existing River Run lift station without needing to upgrade the existing sewer pump station, which is at 120 gpm currently. Therefore, $180 - 120 = 60$, $60 + 45 = 105 \text{ gpm}$ available.

For this proposed project we expect to construct 256 units, of which 208 units are proposed to discharge into the gravity sewer system on Whistalks Way. At a discharge rate of 0.218 gpm per unit is expected to discharge 45.35 gpm, $45.35 \text{ gpm} \leq 105 \text{ gpm}$ available for discharge to the City of Spokane siphon. For this reason, we will be able to discharge to the existing siphon without needing to upgrade the existing siphon.

48 units as mentioned above will also be able to discharge to the existing River Run lift station without needing to upgrade the existing sewer pump station, because the new 48 units are apart of the total of 96 units to already included to discharge to the existing lift station, which will still keep it less than the Tayler rate of 120 GPM.

2. Provide a cross-section of the proposed access and utility easement. Since the interior road network (driveway) is not proposed to be a City standard public or private street, it must be constructed with a minimum 3 inches of HMA over 4 inches of crushed surfacing.

WCE Response: See the updated cross section on the preliminary plat.

Planning:

1. Please provide a draft version of the mutual use and access agreement.

WCE Response: The mutual use and access agreement will be provided at time of final plat.

General Comments on the Plat

Transportation:

1. Our bicycle plan calls for a shared-use pathway along the frontage of Whistalks Way. We'll want this as a frontage improvement instead of sidewalk.

WCE Response: This comment is noted.

2. The eastern driveway appears to be right-in, right-out based on existing channelization on Whistalks. They may be able to modify that to provide a short left-in pocket.

WCE Response: The eastern driveway has been revised and a cul-de-sac has been added to the site to allow for a turnaround and ingress/egress queue lengths.

Spokane Transit Authority:

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

WCE Response: This project is currently proposing a 20-foot by 5-foot pad adjacent to the proposed trail at the existing bus stop location.

2. *The City of Spokane will need to review and approve these bus stop improvements. Please coordinate with Melinda Rehfeldt at mrehfeldt@spokanettanist.com or (509)343-1692. Spokane Transit's bus stop standards are located here, [Bus Stop Design Standards - Spokane Transit Authority](#). To help facilitate access to transit keep sidewalks clear during construction. It is noted that the site plan does show sidewalks along the boundary and interior of the project site, this allows safe and accessible pedestrian access to the nearby transit facilities.*

WCE Response: This comment is noted.

Department of Ecology:

1. *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 find the permit application and related documents online. For additional information, please contact Suman Paudel at (509) 601-2124 or via email at suman.paudel@ecy.wa.gov.*

WCE Response: This comment is noted.

2. *Street trees will be required. A street tree plan will need to be submitted and approved prior to final plat approval.*

WCE Response: Please see the provided plan.

Spokane Tribe of Indians:

1. *After archive research we know that this area contains cultural resources which would be impacted by the proposed ground disturbing activity given its location and presence. A Cultural survey shall be completed by a professional archaeologist prior to any ground disturbing activities. Once the survey / sub-surface testing is completed we will do more mitigation to discuss the plan of action if cultural resources are identified during 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.*

WCE Response: This comment is noted.

Engineering:

1. *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 is noted.

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

WCE Response: This comment is noted.

- b. *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 is noted.

- c. *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 is noted.

- d. *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 is noted.

2. *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. Predevelopment 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.

- a. *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 is noted.

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

WCE Response: This comment is noted.

- c. *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 is noted.

- d. *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 is noted.

- e. *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 is noted.

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

WCE Response: This comment is noted.

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

WCE Response: This comment is noted.

- h. *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.

- i. *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.

3. *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. *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 is noted.

- b. *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.

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

WCE Response: This comment is noted.

- d. *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 is noted.

4. *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.

- a. *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 is noted.

- b. *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: This comment is noted.

- c. *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 is noted.

- d. *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: This comment is noted.

- e. *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: This comment is noted.

5. *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 is noted.

6. *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 is noted.

7. *The preliminary plat references easements to be recorded in separate AFN. 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 is noted.

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

WCE Response: This comment is noted.

Items to be addressed prior to final plat approval:

1. *Addresses must be shown on the final plat. Address permits can be applied for at the City of Spokane permit center or by calling (509) 625-6300.*

WCE Response: This comment is noted.

2. *Redband Apartment Buildings A and B are currently under construction on Lot 1 and the private sewer and water lines serving those buildings are crossing Lot 2. This sewer line must be protected by an easement and the easement must be shown on the face of the Final Plat.*

WCE Response: This comment is noted.

3. *All easements, existing or proposed, must be shown on the face of the plat. If blanket in nature they must be referenced in a Surveyor's Note.*

WCE Response: This comment is noted.

4. *A mutual use agreement will be required for any shared uses such as access, parking, landscaping, on-site stormwater treatment, etc. and for operation and maintenance. This agreement must be recorded on all parcels sharing these uses prior to issuance of any certificates of occupancy. Please reference this document on the final plat.*

WCE Response: This comment is noted.

The following statements will be required in the dedication of the final plat (Additional statements may need to be added to the final plat and will be determined during final plat review)

1. *Ten foot utility and drainage easements as shown here on 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.*
- 2. 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.*
 - 3. 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 the Development Services Department and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department.*
 - 4. All stormwater and surface drainage generated on-site shall be disposed of on-site in accordance with SMC 17D.060 "Storm water 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 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.*
 - 5. 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 Spokane 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 Development Services for review and acceptance prior to issuance of a building permit.*
 - 6. 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.*
 - 7. All improvements (street, sewer, storm sewer, and water) shall be constructed to City standards prior to the occupancy of any structures served by said improvements.*
 - 8. 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.*
 - 9. Only City water and sanitary sewer systems shall serve the plat; the use of individual onsite sanitary waste disposal systems and private wells is prohibited.*
 - 10. All parking areas and driveways shall be hard surfaced. All new or modified driveway locations will need to be reviewed and approved by Development Services prior to construction.*
 - 11. The City of Spokane does not accept responsibility to inspect and/or maintain private drainage easements, nor does the City of Spokane accept any liability for and failure by the lot owner(s) and/or HOA to properly maintain such areas.*

WCE Response: The above required dedication statements have been noted.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "T.R. Whipple", with a large, stylized flourish at the end.

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

Encl: Updated Preliminary Plat

CC: Sponsor
File