

August 23, 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 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 left aligned below in italic type, and our responses are indented in roman type (upright).

Planning:

1. The revised plat map indicates a private road. Private streets/roads are only permitted through a planned unit development. Please clarify.

WCE Response: Please see the revised preliminary short plat which includes access easements between the parcels in the RHD (apartment) and CB-55 (apartment) lots.

- 2. Vehicular Access:
- a. The access driveway appears to exceed 20% front yard parking and maneuvering areas permitted in the RMF zone under Section 17C.230.145 Development Standards for Residential Uses as noted above. The 20% limitation is calculated from the property line to the building setback (actual constructed setback). Please advise if you had prior conversations with planning staff recording the proposed layout of this site including the lot coverage limitation for parking and maneuvering in the front yard setback area.

WCE Response: Please see the revised preliminary short plat which includes a private access easement to the rear of the proposed townhomes, which are in the RHD-35 zone.

b. Similar to above, required parking is not permitted within 20' of the front lot line. It appears that multiple parking stalls are proposed in the front yard setback area. Any non-required parking in the front yard setback will be counted toward the 20% limitation noted above. Were any conversation had with planning regarding this aspect of your project prior to plat submittal.

WCE Response: Please see the revised preliminary short plat which removes all access and parking in/at the fronts of the townhome lots.

c. It appears that there are portions of the proposed access driveway directly adjoining the proposed trail without any protection for pedestrians (proposed lots 5 and 6) – please clarify.

WCE Response: Please see the updated preliminary plat which re-orients the access easement.

3. Please update the preliminary plat map to include existing structures on proposed lot 1. Please include setbacks from these existing structures to the proposed lot lines. This detail is required for platting actions pursuant to 17G.080.040(B)(2) – contents of a short plat map.

WCE Response: Please see the updated preliminary plat which includes setbacks from existing structures to proposed lot lines.

4. Please update the preliminary plat map with a clear delineation between property zoned CB and property zoned RHD-35.

WCE Response: Please see the updated preliminary plat for a clear delineation between zoning within the property.

5. Site data Table – currently there is a minimum, maximum and allowed density that do not appear to match the SMC for density. There is no upper density limit for residential units in the RHD zone nor in the commercial zone. Density will ultimately be determined by other factors such as parking, stormwater, height, etc.

WCE Response: Please see the updated preliminary plat for density calculations for the RHD-35 zone.

6. Slope Table – please update the maximum slope on the slope table. The current maximum slope is of what is meant by a maximum slope of 1444%

WCE Response: Please see the updated preliminary plat. The LiDAR for the preliminary plat may have identified a short vertical slope such as a retaining wall resulting in the slope of 57% +/-, which is approximately equivalent to 1.75:1 (existing slopes, assumed to be 2:1).

7. It is difficult to see what is included in tract A and what is included in tract B – please clarify this portion of the map.

WCE Response: Please see the updated preliminary plat for clarifications and reorientations of the tracts.

- 8. Geologically Hazardous Zones:
- a. Please submit a critical areas application for the steep slopes.

WCE Response: Please see the attached critical areas application.

b. If retaining walls will be required for development of this site, please provide additional information about retaining walls proposed for this development as part of the preliminary plat review.

WCE Response: The project anticipates retaining walls at this time; however, the design for the retaining walls will be made a part of the construction plan submittal process and after consultation with the site geotechnical engineer to the allowable height and type.

- c. Geohazard Evaluation, Preliminary report (17C.040.090).

 This land proposed for development includes areas of steep slopes which require a preliminary evaluation/report and mitigation plan as necessary in compliance with Geologically Hazardous Areas, general performance standards found in 17E.040.100.
 - WCE Response: Please see the attached geotechnical evaluation report for an evaluation of the site and mitigation in compliance with Geologically Hazardous Areas. Section 2.3 of the geotechnical report indicates that the NRCS soils as noted are not present onsite; therefore, the geotechnical report meets the requirements of SMC17E.040 as it goes beyond a geohazard evaluation for this commercial development. As a professional engineer, it is my professional opinion that a geohazard evaluation is not applicable due to the removal of the NRCS soils.
- i. The geological evaluation completed appears to address stormwater and stormwater mitigation; however, the report should also document the extent and nature of geohazards on the subject and shall provide mitigating measures and an assessment of geohazards associated with the proposal. Please update the report to include additional information regarding:
 - 1. Vegetation, including trees, shrubs and forbs in the project area and all critical areas addressed in the report shall be documented and evaluated for relation to slope integrity, stability, erosion control. Vegetation management plans shall adhere to best management practices and should identify opportunities to retain or augment existing native vegetation for slope stability, erosion and sedimentation control.
 - WCE Response: Please see the attached geotechnical evaluation report for an evaluation of the site and mitigation in compliance with Geologically Hazardous Areas. Section 2.3 of the geotechnical report indicates that the NRCS soils as noted are not present onsite; therefore, the geotechnical report meets the requirements of SMC17E.040 as it goes beyond a geohazard evaluation for this commercial development. As a professional engineer, it is my professional opinion that a geohazard evaluation is not applicable due to the removal of the NRCS soils.
- 2. Additional Application requirements are found in 17E.040.080.
- ii. Please note that when the director determines that the significant adverse impact of a use or activity located in a geologically hazardous area cannot be mitigated through standards identified in SMC 17E.040.100, the project proponent shall prepare a geohazard mitigation plan to identify construction standards for the proposal.
 - **WCE Response:** This comment is noted. A geohazard mitigation plan will be prepared if deemed necessary by the director.
- iii. Please also note that per Section 17E.040.120 Subdivision and Dedication Notice, the division of land in landslide hazard areas is subject to the following:
 - 1. Land that is located wholly within a landslide hazard area or its buffer may not be subdivided. Land that is located partially within a landslide hazard area may be subdivided provided that each resulting lot has sufficient buildable area outside of, and will not affect, the landslide hazard.
 - **WCE Response:** This comment is noted. The site is not located within a landslide hazard area.

2. Access roads and utilities may be permitted within the landslide hazard area if the City of Spokane determines that no feasible alternative exists.

WCE Response: This comment is noted. The site is not located within a landslide hazard area.

3. Final subdivisions located within geologically hazardous areas shall contain language in the plat dedication to indicate lots or portions of lots that are affected by geologic hazards. In addition, building setback lines may be drawn on lots, parcels and tracts so as to indicate suitable areas for construction of structures or improvements.

WCE Response: This comment is noted and the plat dedication will indicate all lots or portions of lots within a geologically hazardous location.

9. As noted by Donna deBit during the initial agency review for this plat, please provide a draft copy of the required perpetual shared use/access agreement for any shared facilities such as parking, stormwater, etc. Based on the revised site plan detail, the shared facilities also include facilities associated with the existing construction on parcel 25113.0061.

WCE Response: This will be a platted element and therefore provided at that time once final development plans have been implemented.

Transportation (Inga Note):

10. Please update the trip generation evaluation since the access points changed.

WCE Response: Please see the updated trip generation and distribution letter.

Engineering:

11. Thank you for providing the requested 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. Engineering has completed a preliminary review of this analysis and we anticipate a completed, formal evaluation from the wastewater department shortly.

WCE Response: This comment is noted.

12. Please 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: Please see the updated preliminary plat for a cross-section for the proposed access. Utility easements will be by separate document at time of final platting.

General Comments on the Plat:

Transportation:

1. Our bicycle plan calls for a shared-use pathway along the frontage of Whistalks Way. (M. Owen update – thank you for submitting a revised proposal showing a shared use path along the frontage of Whistalks Way. The shared use path along Whitstalks Way will be included as a condition of approval for the platting action).

WCE Response: This comment is noted as a condition for approval and is shown on the attached plans.

Streets (Bobby Halbig):

- 2. Please see enclosed memo from Bobby Halbig dated June 22, 2023. These comment would be addressed at time of engineering plan review as applicable based on the final layout of lots, access, etc.
- a. 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: Please see the attached preliminary plat for access easements, public stub roads with cul-de-sacs have been added to remedy these concerns.

- b. 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: Please see the updated preliminary plat for updates to left turn pockets on Whistalks Way.
- c. Ped/bike trail along the south side of Whistalks Way should be shown to see if proposed roadway will fit/work. Dedication of ped/bike trail req'd?
 - **WCE Response:** Please see the updated preliminary plat, which shows pedestrian/bike trails along Whistalks Way.
- d. Slope of proposed N/S roadway, south of the east entrance, is too severe for a street.
 WCE Response: No profiles have been prepared at this time, they will be submitted at time of final design within acceptable city standards.

Spokane Transit Authority:

- 3. 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 comment will be addressed at time of engineering plan submittal, we believe the bus stop should be relocated to upstream of the Elliott Road signal.
- 4. 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 will be addressed at time of engineering plan submittal.

Department of Ecology:

5. Please see enclosed letter dated June 22, 2023, with Water Quality Program and General SEPA information. This letter appears to be the same/similar to the letter previously submitted by WSDOE.

Water Quality Program

a. 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@ecv.wa.gov.

WCE Response: A SWPPP will be prepared, and a construction stormwater general permit will be applied for at time of civil plan submittal and prior to land disturbing activities.

State Environmental Policy Act (SEPA)

b. Ecology bases comments upon information submitted for review. As such, comments made do not constitute an exhaustive list of the various authorizations you may need to obtain, nor legal requirements you may need to fulfill in order to carry out the proposed action. Applicants should remain in touch with their Local Responsible Officials or Planners for additional guidance.

For information on the SEPA Process, please contact Cindy Anderson at (509) 655-1541 or via email at Cindy. Anderson @ecy.wa.gov.

WCE Response: The project will communicate with the local responsible official and planner throughout the platting and development process.

Planning:

6. 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 will be addressed as a part of the engineering plan submittal.

7. Street trees will be required. Thank you for submitting a preliminary street tree plan with your revision submittal dated June 6, 2023. A copy of this plan will be requested at time of your final plat submittal and will be reviewed for approval at that time.

WCE Response: This comment will be addressed as a part of the final plat submittal.

8. The build out of the site including compliance with development standards for CB and RHD zones, parking, etc. will be evaluated at time of construction permit(s). Should you have questions about code compliance, please feel free to reach out at any time.

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

9. Planning will include required dedications language and other general comments related to final plat submittal in a future technically complete letter.

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

Spokane Tribe of Indians:

The following comment will need to be addressed prior to any ground disturbing activities. Please see the enclosed second letter submitted by Spokane Tribe of Indians on June 21, 2023, related to this matter. Given that the recommendation proposed during this round of agency review has been modified, we suggest contacting Randy Abrahamson to discuss the best path forward related to cultural resource protection.

- 10. 06/21/2023 Recommendation: Cultural monitoring in all ground disturbing activity.
- 11. 04/19/2023 Recommendation: 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: A cultural resource survey was completed and is included in this submittal.

Engineering:

- 12. The developer will be responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.
- a. The sanitary sewer system shall be designed and constructed in accordance with City standards.

WCE Response: This comment is noted and will be addressed during construction plan submittal.

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 will be addressed at time of construction plan submittal.

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 will be addressed at time of construction plan submittal.

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: The sanitary sewer system is not anticipated to be private at this point.

13. 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: It is inferred that this will be a private sewer. The access at the rear of lots 5-8 may be public, at which time the access may become a public alley.

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 will be addressed as a part of the final plat submittal.

b. 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 as a part of the construction plan submittal.

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 will be addressed as a part of the construction plan submittal.

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 will be addressed as a part of the construction plan submittal.

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 will be addressed as a part of the construction plan submittal.

f. The stormwater system shall be designed and constructed in accordance with City standards. WCE Response: This comment will be addressed as a part of the construction plan submittal.

- g. Construction plans shall be submitted to Development Services for review and acceptance. WCE Response: This comment will be addressed as a part of the construction plan submittal.
- 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 will be addressed as a part of the construction plan submittal.

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 will be addressed as a part of the construction plan submittal.

- 14. Street design for the plat shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.
- 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 will be addressed as a part of the construction plan submittal.

b. 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 as a part of the construction plan submittal.

- c. Construction plans shall be submitted to Development Services for review and acceptance. **WCE Response:** This comment will be addressed during the construction phase.
- 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 will be addressed as a part of the construction plan submittal and prior to final plat.

- 15. 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.
- 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 will be addressed as a part of the construction plan submittal.
- 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 will be addressed as a part of the construction plan submittal.
- 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 will be addressed as a part of the construction plan submittal.
- 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 will be addressed as a part of the construction plan submittal.
- 16. 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 as a part of the construction plan submittal.
- 17. 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 as a part of the construction plan submittal.
- 18. 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 will be addressed as a part of the construction plan submittal.
- 19. 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.

Items to be addressed prior to final plat approval:

I. 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 will be addressed as a part of the final plat.

II. 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 will be addressed as a part of the final plat.

III. 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 will be addressed as a part of the final plat.

IV. 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 will be addressed as a part of the final plat.

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):

A. 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.

WCE Response: This comment will be addressed as a part of the final plat.

B. 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 as a part of the final plat.

C. 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.

WCE Response: This comment will be addressed as a part of the final plat.

D. 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.

WCE Response: This comment will be addressed as a part of the final plat.

E. 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.

WCE Response: This comment will be addressed as a part of the final plat.

- F. 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 will be addressed as a part of the final plat.
- G. 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.

 WCE Response: This comment will be addressed as a part of the final plat.
- H. 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 as a part of the final plat.

I. 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 as a part of the final plat.

J. 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.

WCE Response: This comment will be addressed as a part of the final plat.

K. 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: This comment will be addressed as a part of the final plat.

Red Band Preliminary Plat Response to Determination August 23, 2023 Page 13 of 13

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: Critical Areas Checklist

Updated preliminary plat

CC: Sponsor

File