

May 16, 2023



300 WEST GARNETT AVENUE
SPOKANE, WASHINGTON 99201-3329

509.625.6300

MY.SPOKANECITY.ORG

Whipple Consulting Engineers, Inc.
c/o Todd Whipple
21 S Pines Rd
Spokane Valley, WA 99224

RE: Review of File # Z23-044PPUD– Victory Heights Preliminary Long Plat

Dear Mr. Whipple,

This letter is to inform you that the application materials for the above mentioned preliminary plat were found to be technically incomplete, based on a review required under Spokane Municipal Code (SMC) 17G.060.090, Determination of a Complete Application. The following comments were received from various departments and agencies that require addressing before this application can be considered technically complete and proceed to Notice of Application:

SEPA COMMENTS:

1. Are the depths to bedrock known in this area (SEPA Checklist question A.15.b.(1))?
2. Section B.3.d.: applicant's answer references a concept storm report for more information. Please provide the referenced report.
3. Section B.14.e: applicant's answer states that the project will not occur within the vicinity of water, rail, or air transport but portions of the proposed plat abut railroad right-of-way. Please clarify.
4. Transportation comments are via Inga Note.

ENGINEERING PLAT COMMENTS

1. The project narrative provided by Whipple Consulting Engineers, Inc, dated January 18, 2023, states the project is proposing to develop 1,003 lots with this subdivision. The narrative provides expected gallons per day for sewer and water based on 1,003 lots, but then proposes utilizing the Building Opportunity and Choices for All (BOCA) Interim Ordinance which would allow for up to 4,012 units if fully built out. Please clarify how BOCA may impact the sewer and water system, both existing and proposed.
2. The Plat application was submitted as a PUD which appears to be for planning purposes. Streets and utility systems were submitted as public facilities and are being reviewed accordingly.
3. Please provide a title report as per SMC 17G.080.040(B)(1)(d).
4. Existing topographic lines are not labeled. We are unable to determine if they are representing the maximum two-foot interval as required by SMC 17G.080.040(B)(2)(o). Please clarify.
5. Our maps indicate slopes exceeding 15%, slopes exceeding 30%, DNR streams, and erodible soils in the project area. Please complete and submit a geohazard evaluation/mitigation plan for review.
6. Please provide the correct parcel numbers for the properties adjacent to the proposed plat.
7. Proposed access easements for stormwater facility maintenance shall be shown on the preliminary plat.
8. The Tract at the north boundary of the plat should be given a letter designation to be consistent with the other proposed tracts within the plat.
9. The following items are required on the preliminary plat per SMC 17G.080.040(B)(2):
 - a. Legal description;
 - b. The numbers proposed to be assigned to each lot and block;
 - c. Conditions of adjacent property, platted or unplatted, and if platted, giving the name of the subdivision;
 - d. The names and address of the record owners and taxpayers of each parcel adjoining the subdivision;
 - e. Indicate any street grades in excess of eight percent;

- f. Critical areas as defined in SMC 17E;
- 10. The following items are required per SMC 17G.080.070:
 - a. Where alleys are not provided, easements for public utilities shall be provided adjacent to any right-of-way.
- 11. Per SMC 17H.010.030 "Street Design":
 - a. A grid pattern featuring more street intersections and shorter block lengths should be implemented whenever possible.
 - b. Block lengths should not exceed 650 feet.
- 12. Public right-of-way widths shall be in accordance with the city's comprehensive plan, the City's engineering design standards, or as directed by the Director of Engineering Services. Minimum right-of-way widths are shown in Table 17H.010- 2, Local Access Right-of-way, and Street Widths. The right-of-way width varies based on the required street elements including number of lanes, on-street parking, bike lanes, medians, turn lanes, roadside swales, pedestrian buffer strips and street trees. Any deviations from the minimum set forth requires approval of a Design Variance.
 - a. Patrick Ct is shown with a proposed forty-foot wide right-of-way. Please clarify.
 - b. Narrower right-of-way widths may be allowed at the discretion of the director of engineering services. Variance requests will be evaluated based on topography, traffic circulation, emergency vehicle access, zoning, existing development, and on-street parking requirements.
- 13. New, permanent dead-end or cul-de-sac streets require the approval of the director of engineering services. Dead-end and cul-de-sac streets are only allowed when street connectivity is unachievable, such as property that is isolated by topography or the configuration of existing lots and streets.
 - a. Turn-arounds designed to meet the City's standards are required at all street dead-ends to allow emergency and service vehicles to turn around.
 - i. Please show the radius of the right of way for all proposed cul-de-sacs and dimension proposed hammer-head turn-arounds.
 - b. Dead-end or cul-de-sac streets shall be not less than one hundred forty feet nor more than six hundred feet long along the centerline as measured from the curb line of the cross street at the street entrance to the point of curvature into the cul-de-sac bulb. Proposed exceptions to this rule will be considered by the Director of Engineering Services based on pertinent traffic planning factors.
 - c. A hard surfaced public pathway shall be provided at the end of every dead- end or cul-de-sac street connecting the sidewalk to an existing or future street or public pathway.
- 14. Approved roadway names will be required prior to submitting civil engineering drawings.
 - a. Summerwood St is accepted as a continuation of the existing Summerwood St.
 - b. The dead-end of Summerwood St shall be identified as a Court. Summerwood Ct is acceptable.
 - c. Talon Dr is a continuation of the existing W Talon Dr, but runs in a north/south course. We have reached out to SREC to discuss alternate solutions such as possible changing the name of the roadway north of Patrick Ct in order to maintain the continuity of the directional indicator "W" for Talon Dr.
- 15. Please provide clarification for the intents of all Tracts (e.g. open space, stormwater treatment, stormwater disposal, etc.) as well as the party responsible for maintaining said tracts.

Water Requirements

1. The Grandview-Thorpe area is served by a single 30-inch water transmission main in the Low Pressure Zone which supplies water upgradient to the SIA Pressure Zone. The water reservoir capacity within the SIA Pressure Zone is approaching capacity for the maximum number of lots/development and the ongoing emergency intertie use and demands for the City of Airway Heights.
 - a. The nearest water main which could provide service to the proposed plat is a 30- inch ductile iron transmission main located in Thorpe Road, adjacent the project site.
 - b. The developer(s) will be responsible for all costs associated with design and

- construction of water improvements necessary to serve the proposed plat.
- c. The water system shall be designed and constructed in accordance with City standards and State 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 relief valves be installed at developer expense.
 - d. An electronic version (pdf) of an overall water plan and hydraulic analysis must be submitted to the Development Services Center for review and acceptance. The hydraulic analysis must include supporting calculations for domestic and fire flows per City of Spokane Design Standards and State standards.
 - e. 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.
2. Phasing Restrictions (Water)
Due to the high number of developments in the Grandview/Thorpe and West Plains area, the reservoir storage capacity in the SIA Pressure Zone is nearing capacity. Thus the City is requiring a phased approach for larger developments until SIA#3 Storage Tank is in service. This third water storage is anticipated to be constructed and operational in 2024 barring any unforeseen circumstances. Currently, the City's projected time frame is contingent upon weather, painting of the tank, and minimal construction disruptions. Until such time as this third SIA #3 Storage Tank is operational and in service, development is limited to 170 lots, expected to be connected in phases to the Low Pressure Zone. The remaining phases of the Plat may continue to develop after the SIA #3 Storage Tank is completely operational. This will allow time for the City to construct the planned Thorpe Twin Storage Tank and Thorpe #2 Booster Station, which are future projects that will provide additional service to this area as described in the Citywide Capital Improvement Program.
- Possible solutions to reduce water demands include adding fire sprinklers to all proposed buildings and reducing outdoor irrigation. The addition of fire sprinklers in buildings will reduce fire flow demands to the system and can provide insurance benefits. Reducing outdoor irrigation can be achieved by designing and constructing xeriscaping or "Spokanescape" type landscapes. Reducing outdoor irrigation demands by using xeriscaping or "Spokanescape" type landscapes provides a reduction in water use and provides the additional benefit of lower maintenance saving both time and money.
3. There are three existing "temporary" water taps off the transmission main in Thorpe serving parcels 25351.0601, 25351.0602, and 25351.0603. These taps will need to be disconnected prior to final plat.

Sanitary Sewer Requirements:

1. The nearest existing public sanitary sewer which could provide service to this proposed plat is a 24-inch concrete sewer main in Thorpe Road.
2. The developer will be responsible for all costs associated with design and construction of sanitary sewer improvements necessary to serve the proposed plat.
3. The sanitary sewer system shall be designed and constructed in accordance with City standards.
4. 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.

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

1. All easements, existing or proposed, must be shown on the face of the final plat. If blanket in nature they must be referenced in a Surveyor's Note.
2. Lot plans, following the criteria outlined in the Spokane Regional Stormwater Manual Appendix 3C, must be submitted for review.
3. All water and sewer service connections must front the lot they are to serve. Offset connections will not be allowed. Any unused water service connections shall be killed and capped at the main. All punch list, utility installations, and pavement removal and replacement shall be complete and approved by the City before any bonds are released.

4. 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.

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

1. 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.
2. Ten-foot utility 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.
3. 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.
4. Prior to the issuance of any building permits, the lots shall be connected to a functioning public or private sanitary sewer system and connected to a public or private water system, complying with the requirements of the Development Services, and having adequate pressure for domestic and fire uses, as determined by the Water and Hydroelectric Services Department and the Fire Department.
5. 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.
6. All Stormwater and surface drainage generated on-site must be disposed of on-site in accordance with chapter 17D.060 SMC, Stormwater Facilities, the Spokane Regional Stormwater Manual, and City Design Standards. A surface drainage plan shall be prepared for each lot and shall be submitted to the City of Spokane Planning & Development Department for review and acceptance prior to the issuance of a building permit on said lot.
7. No building permit shall be issued for any lot in this subdivision/PUD until evidence satisfactory to the Director of Engineering Services has been provided showing that the recommendations of Chapter 17D.060 SMC, Stormwater Facilities, and the Project Engineer's recommendations, based on the drainage plan accepted for the final subdivision/PUD, have been complied with.
8. 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.
9. All street identification and traffic control signs required by this project will be the responsibility of the developer per SMC 17G.080.070.
10. The development of any structures in this plat is subject to review of a geotechnical evaluation for foundation design and to determine suitability and affects from stormwater and/or subsurface runoff and for slope stability. The geotechnical evaluation is required to be performed for each lot with structures and submitted for review and concurrence to the City of Spokane Building Department and Development Services prior to issuance of a building permit.
11. The City of Spokane does not accept responsibility to inspect, and/or maintain the private drainage easements, nor does the City of Spokane accept any liability for and failure by the lot owner(s) to properly maintain such areas. The City of Spokane is responsible for maintaining storm water facilities located within the public right-of-way as shown in the final plat documents. Maintenance shall include cleaning the structures and pipes.

Transportation – Inga Note:

1. An extensive traffic analysis will be required prior to a SEPA determination. I will coordinate with the County and WSDOT to sent up a meeting.

WSDOT – Greg Figg:

1. Given the scale and location of this proposed development, WSDOT is requesting that a traffic impact analysis (TIA) be prepared that will address the project impacts to US 195. WSDOT will be participating in the scoping of this TIA with the applicant's engineer today along with the local agencies. WSDOT requests that this TIA be submitted and accepted before a SEPA decision is rendered on this project. Please let me know if you have any questions.

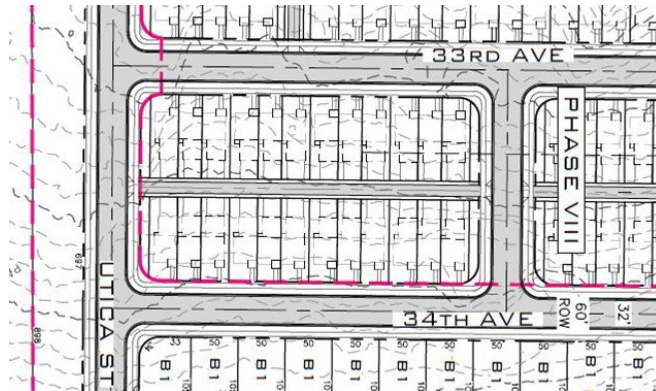
STA – Melinda Rehfeldt:

1. 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, Thorpe Rd may be a candidate for bus service in the future. Please identify prospective locations for future bus stops near Thorpe Rd that can be added later in a way without dramatically altering stormwater swales or other features in the right of way. Please coordinate sidewalk plans to ensure an ADA boarding and alighting pad is adjacent to the roadway.

Streets – Bobby Halbig:

Sheet C1.2

1. Per CoS Standard plans, a street name sign may only be 48" wide. The street name "Victory Heights Dr" would require a reduction in character width of 43% which would not meet current FHWA standards. Please consider a different name for this roadway.
2. The intersection of Utica St and 35th Ave shall have a minimum of 20ft radius curb-line for the outside radius. A right-angle curb-line is not allowed.
3. Provide names of all proposed roadways.



General Comments on the Plat:

Engineering:

1. Construction plans for water and sewer main extensions must be designed by a Professional Engineer (licensed in Washington) and must follow City drafting and design standards. A water and sewer capacity study per City of Spokane standards shall show City system improvements that will be required depending upon the timing of the development and anticipated demands.
2. 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.
 - a. The proposed plat is located within a High Critical Aquifer Recharge Area and is considered to have moderate susceptibility for groundwater contamination.
 - b. The proposed plat includes wetland designated area which shall be administered in accordance with SMC 17E.070 "Wetlands Protection".
 - c. 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.

- d. Lot plans, per Appendix D of the Spokane Regional Stormwater Manual, shall be submitted along with the civil engineered plans.
3. All stormwater facilities necessary to serve the proposed plat shall be designed and constructed in accordance with City standards. The access to Tract A looks quite steep. Grades exceeding 8% will require a Design Deviation Request with supporting justification that must be signed by the Director of Engineering Services prior to construction.
 - a. Prior to construction, a grading and drainage plan shall be submitted to Development Services for review and acceptance.
 - b. 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.
 - c. 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.
 - d. The developer will be responsible for all costs associated with constructing storm water improvements necessary to serve the proposed plat.
 4. 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.
 - a. Signing and striping plans, where appropriate, shall be included as part of the design submittal.
 - a. Street design for the plat shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.
 - b. Any grades exceeding 8% must be shown on the preliminary plat.
 - c. Garages shall be a minimum of 20 feet from the back of sidewalk to fully accommodate a parked vehicle without obstructing the sidewalk.
 - d. 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.
 - e. The developer will be responsible for all costs associated with constructing street improvements necessary to serve the proposed plat.
 - f. Construction plans for public street, sewer, water, and storm water 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.
 - g. Per Section 17H.010.110 Hillside Development in steep, hillside areas, a reduced street cross section may be allowed if the cross slope is at least fifteen percent and lots will be developed on only one side of the street. In such cases, waiver of one sidewalk and pedestrian buffer strip may be granted at the discretion of the Director of Engineering Services, provided that no lots access the omitted side. Additionally, on street parking may be omitted on one side to allow for a narrower street width.
 5. Generally, all new local access streets shall provide on-street parking on both sides of the street. Parking may be omitted from one side of a residential street in the following situations:
 - a. Hillside developments as described in SMC 17H.010.110 where lots are

- developed on only one side of the street.
 - b. Neighborhoods where garage access is provided from alleys and driveway access to the street is restricted.
 - c. The side of a street adjacent to side yards, rear yards, or common areas such as stormwater facilities. Parking may not be omitted adjacent to parks or other recreational facilities.
6. Per Section 17H.010.180 Sidewalks:
- a. Sidewalks shall be located on both sides of the street for all public and private streets.
 - b. Sidewalk shall be constructed around the bulb of cul-de-sacs so that every lot is served by a sidewalk.
7. Per Section 17H.010.190 Pedestrian Buffer Strips:
- a. Pedestrian buffer strips are required on both sides of all streets between the sidewalk and the curb. The width and type of pedestrian buffer strip for each street shall comply with the requirements of the comprehensive plan and the city's design standards.
 - b. Planted strips are required on residential local access streets. A minimum three-foot wide concrete pedestrian buffer strip may be allowed in place of the planted strip for certain land uses such as churches and schools that require passenger loading and unloading. These will be evaluated on a case-by-case basis and allowed at the discretion of the Director of Engineering Services.
 - c. In situations where a separation between the sidewalk and the street is constrained by topography, narrow right-of-way or existing development, a variance from this standard may be granted by the Director of Engineering Services.
 - d. In cases where sidewalk has been omitted on one side of the street, the pedestrian buffer strip may also be omitted on that side.
 - e. Pedestrian buffer strips may be omitted around the bulb of cul-de-sacs.
8. Plan review fees for sanitary sewer, water, street, and storm water improvements will be determined at the time of plan submittal and must be paid prior to the start of review.
9. All Tracts within the boundaries of this proposed plat will be maintained by a Homeowners' Association established for this development. Said stormwater facilities will be operated and maintained in accordance with an operation and maintenance manual written by a licensed engineer in the State of Washington.
10. A \$250.00 deposit will be required for each monument to be installed as part of the final plat.
11. Civil engineered plans and profiles shall use NAVD88 datum (City of Spokane datum minus 13.13 feet).
12. In accordance with the City's Financial Guarantee Policy, a financial guarantee will be required for all street, drainage, and erosion / sediment control improvements not constructed prior to approval of the final plat.
13. Preapproved road names shall be identified on plat documents at the time of Final Plat submittal.
- a. Per Section 17D.050A.060 Roadway Naming Standards:
 - i. Duplicate roadway names will not be allowed. Any roadway name shall not duplicate any county roadway names unless the new roadway is in alignment with the existing county roadway.
 - ii. Roadways with the same root name but different suffix (that are not in reasonable alignment with the existing roadway) will be considered as a duplicate roadway name, e.g., Chesterfield Drive or Chesterfield Lane and thus disallowed.

Spokane Parks Department:

1. The preliminary plat proposes 1,003 new residential units within the Grandview/Thorpe neighborhood. Current city park distribution standards as outlined in the '2022 park and natural lands master plan' adopted by the City Park Board and City Council require a developed public park be within a 10-minute (1/4 mile) walk of all city residents. According to 'Map 10 - Walkshed Park Gaps', all proposed units in the proposed preliminary plat are located within a 'substandard park service area' as all units are located outside a 10-minute walk of a developed public park property. As a result, City of Spokane Parks recommends the developer dedicate land within the proposed development area to the City of Spokane for use as a developed public park. City Parks recommend said land dedication be conducted in accordance with 'Table 13 – Guidelines for Park System Expansion', as adopted within the park and natural lands master plan.
 - Table 13 recommends the developer dedicate 3.26 acres of public park land per 1,000 people for any new residential development within a substandard service area. Per 2020 population statistics, the average size of a household in Spokane City is 2.32 people. As the preliminary plat proposed 1,003 units and the average household size in Spokane is 2.32 people, table 13 recommends the developer contribute a total of 5.4 acres of contiguous property centrally located within the development for development as a neighborhood park, situating the property to maximize households within a 10 minute walk of the park property.

It is important to note that the land dedication recommendations listed above recommend park land dedication only as required to preserve existing levels of park service / quantity of park land per 1,000 residents, but do not to improve the amount of park land per 1,000 population. Dedication of park land within proposed developments within substandard park service areas is critical to providing essential park services to city residents.

A link to the entire park master plan document is below for your reference. Adoption resolutions by the City Council & Park Board are attached for your reference.
<https://my.spokanecity.org/parksrec/master-plan/adopted-plan/>

Spokane Regional Health District – Michael F LaScuola

1. All demolition/construction debris must be transported to a licensed solid waste disposal facility. No on-site burning or burying of debris will be allowed.
2. If the site of the proposed project requires fill or grading, and clean soil or rock are used, no action is required by the Health District. If the fill will include inert waste such as concrete or asphalt it shall not exceed 250 cubic yards without obtaining an inert waste landfill permit. Sites requiring an inert waste landfill permit shall comply with WAC 173-350-410. Any other regulated solid waste placed on the site shall meet the requirements of the Chapter 173-350 WAC.
3. Inert wastes such as concrete can be utilized if crushed, rendered, or processed into an engineered specified aggregate material in accordance with ASTM standards and it is certified and signed by an engineer licensed in the state of Washington.
4. Please be advised that any on-site septic disposal system for a property that will be connected to the municipal sewer must be decommissioned in accordance with Chapter 246-272A WAC Section 300, Abandonment. Any existing on-site septic systems that will continue to be actively used must abide to all minimum setback requirements as specified in WAC 246-272A-0210 Location. Table IV, Minimum Horizontal Separations.
5. Any on-site drinking water or irrigation well on the subject property that is no further in use must be decommissioned in accordance with Chapter 173-160 WAC Section 381 Standards for decommissioning a well.

Spokane Tribe:

1. Provide a Cultural Resource Survey prior to any ground disturbing activity.

Department of Ecology: Ecology Requirements -

Hazardous Waste and Toxics Reduction Program

Please keep in mind that during the construction activities associated with the Victory Heights Planned Unit Development project, some construction-related wastes produced may qualify as dangerous wastes in Washington State. Some of these wastes include:

- Absorbent material
- Aerosol cans
- Asbestos-containing materials
- Lead-containing materials
- PCB-containing light ballasts
- Waste paint
- Waste paint thinner
- Sanding dust
- Treated wood

You may find a more comprehensive list, as well as a link to identify and designate your wastes on the Common Construction and Demolition Wastes website.

The applicant, as the facility generating the waste, bears the responsibility for all construction waste. The waste generator is the person who owns the site. Even if you hire a contractor to conduct the demolition or a waste service provider to designate your waste, the site owner is ultimately liable. This is why it is important to research reputable and reliable contractors.

In order to adequately identify some of your construction and remodel debris, you may need to sample and test the wastes generated to determine whether they are dangerous waste.

For more information and technical assistance, contact Alex Bergh at (509) 385-5539 or via email at Alexandra.Bergh@ecy.wa.gov.

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.

If you have questions or need further assistance, please contact Suman Paudel at (509) 601-2124 or via email at suman.paudel@ecy.wa.gov.

Water Resources Program

The water purveyor is responsible for ensuring that the proposed use(s) are within the limitations of its water rights. If the proposal's actions are different than the existing water right (source, purpose, the place of use, or period of use), then it is subject to approval from the Department of Ecology pursuant to Sections 90.03.380 RCW and 90.44.100 RCW.

For more information, please contact Herm Spangle at (509) 209-3421 or via email at herm.spangle@ecy.wa.gov.

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 Victory Heights Planned Unit Development references the construction of stormwater facilities, if this includes impoundments that meet and 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 at (360) 407-6066 or via email at charlotte.lattimore@ecy.wa.gov.

State Environmental Policy Act (SEPA)

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.

Due to the need for additional information this application is thus deemed technically incomplete and will be halted until such is resubmitted. You have 60 days from the of the date of this letter to provide the required data in accordance with SMC 17G.060.090 C.2. If additional time is warranted, a request in writing for an extension may be granted by the Planning and Development Director. If requested data or an extension request are not received within 60 days, all application materials and a portion of fees paid will be returned your client.

If you have any questions regarding these requirements, please let me know by calling 625-6638. Please make an appointment with me to resubmit these materials with me. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Ali Brast".

Ali Brast for Donna deBit
Associate Planner
City of Spokane