March 4, 2021

Melissa Owen, Assistant Planner
City of Spokane Development Services
808 W Spokane Falls Blvd
Spokane, Washington 99201

RE: Z20-184PPUD Latah Glen Manufactured Home Park – Response to Comments

Dear Melissa,

Thank you for the agency Technical Review comments received November 16, 2020, and later organized into your Request for Additional Information Letter, received December 1, 2020 about the subject Planned Unit Development (PUD). Below are the Storhaug Engineering responses which address the comments from this review. The attached Manufactured Home Park (MHP)/PUD document set has been updated to address comments, as needed, to continue this process moving toward a hearing. The original comments from the Request for Additional Information Letter are reprinted below followed by Storhaug Engineering responses in **bold italics**.

Planning:

The following comments must be addressed prior to moving forward in the Preliminary Plat and PUD process:

1. Prior to certification as “technically complete” formal recommendations from the Design Review Board must be received in addition to other requested additional information. Please note that Planning may provide additional comment following completion of the required design review process and as revised materials are submitted.

   **Response: Complete – see attached DRB recommendation letter.**
2. The required landscape buffer is not met at the proposed entrance

*Response: The entry to the park has been updated to include a full-width buffer including an associated reduction in the lease spaces possible there.*

or around the south and western park boundary (no buffer indicated on the site plan). Please revise the site plan to include the required 20’ landscape buffer around the entire park boundary pursuant to Section 17C.345.120(F) - Development Standards for Mobile Home Parks.

*Response: We understand the site to include significant, established existing trees, shrubs, and grasses to remain along the south, west, and a portion of the north boundary that exceed the required buffer depth - see Context/Site Analysis sheet for aerial image and clouded boundary of these areas; areas that are anticipated to remain are indicated on the Site Plan. We understand them to meet or exceed the intent of the L1 landscape buffer, as stated at 17C.200.030 - Landscape Types:*

“Plants used in the various situations shall be as follows (existing vegetation may be incorporated into the landscape design and be considered acceptable in lieu of new plantings so long as it contributes to achieving the intent of this chapter).”

*The Site Plan has been updated to indicate a 20’ L1 landscape buffer around the entire site, and a note remains to ‘augment existing steep slope/natural areas with plants as needed to achieve L1 buffer intent’ in these areas.*

Please also note that the twenty-foot strip around the boundary of the manufactured home park and all open spaces and other unimproved areas must be suitably landscaped. All landscaping must be maintained and furnished with an automatic sprinkler system.

*Response: Noted.*

3. A minimum setback of twenty feet is required for any garage or carport that opens facing a street (and 20’ behind the back of walk on streets with sidewalks). Please add this setback to the site plan detail.

*Response: These setback distances are indicated on the Typical Lease Space details on the Site Plan sheet.*
4. Please include additional detail regarding the open space provided. Specifically, detail the type of open space provided (natural v. landscaped) pursuant to Section 17G.070.200(C)(2)(b) Application Process.

a. Please also identify the amount of open space that is environmentally constrained versus open space that is not constrained. Per Section 17G.070.030(E)(1)(c) Development Standards environmentally-constrained land within the planned unit development, including geologically hazardous areas, may be used to meet up to fifty percent of the total required open space for the development provided that these areas are either accessible to pedestrians to the extent practical or are visually accessible from adjacent and adjoining common open space.

Response: The Site Plan indicates areas where existing trees and vegetation are anticipated to remain; see Context/Site Analysis sheet for aerial imagery of existing site. Buffer areas and areas outside these established natural areas are anticipated to be improved. The Site Plan has been updated to indicate accessible common open space and common open space that is constrained by slopes greater than 30% as well as those areas found within the Hazardous Geology layer on available City of Spokane GIS.

Note that the attached 09.20.2020 Geotechnical Report by Liberty Geotech states the site is suitable for the proposed development with recommendations implemented.

Most of the accessible pedestrian amenities and almost half of the total accessible pedestrian common area is located within the 'hazardous geology' area, but we understand that the area poses no geological hazard constraint, as the proponent intends to implement geotechnical engineering recommendations throughout construction of the proposed development.

5. Please note that the setback from any walking path is 10’ – please make sure the setbacks shown include a 10’ setback to living space from any sidewalk or walking path.

Response: Noted. The typical units, paths and sidewalks were laid out on the Site Plan in compliance with this parameter. The Typical Lease Space details have been updated, as needed, to include this minimum dimension to sidewalks and walking paths.

6. Parking areas at intersections are not recommended – parking stalls near intersections present safety concerns as well as in conflict with the design standards of the PUD code Section 17G.070.140(B)(4 & 10) Community Environment.

Response: Noted. Additional off-street parking has been designed throughout the development for the benefit of the future residents and their guests, i.e., to attend and bring supplies to a gathering at the Clubhouse or home, a visit to the leasing office by a prospective lessee, etc.
The Plan has been updated to create more distance between intersections and parking areas by removal of parking spaces closest to an intersection and crosswalks are indicated where intended at intersections, where appropriate.

7. Please provide a lighting plan or other schematic/illustrative detail. The current plans indicate adherence to city standards for signs and lighting, but this does not address the plan requirement found in Section 17G.070.200(C)(9)(F) Application Process. Please note that a lighting plan may be requested as part of the design review process.

Response: it is the intention of the proponent to include a Dark-Skies-compliant light with each lease space. These are updated on the Typical Lease Space details on the Site Plan with the referenced Code section. Additional lights are indicated at the project entry, pedestrian crossings, common off-street parking areas, and where there is atypical distance between lease spaces. Will comply with lighting requirements as conditioned.

8. Please provide a circulation plan as per 17G. 17G.070.200(C)(7)(D) Application Process. An example of this kind of plan is found at https://static.spokanecity.org/documents/projects/deep-pine-overlook/deep-pine-overlook-revised-concept-site-plans.pdf. Please note that a circulation plan may also be requested as part of the design review process.

Response: Per the referenced Code, the Site Plan sheet includes an approved roadway section for a two-way private road system with 5'-0" sidewalk on one side, which is typical throughout the proposed Manufactured Home Park and shown on the plan. In addition, sidewalks have been depicted on the plan, called out on the plan, and referenced in the legend. The plan has been updated to include directional arrows on the roads and crosswalk locations to add additional clarity to the proposed pedestrian circulation system.

9. Units on the side of the street without sidewalk appear to have a combination driveway with walkway to the unit. As per 17G.070.140(B) – Community Environment, the entryways of the buildings should be well defined and oriented to the street.
Better defined entry way.

Response: The 'Typical Lease Space – Sidewalk in Common Area' detail on the Site Plan has been updated to depict a direct sidewalk connection from the home to the roadway where there is no sidewalk.

10. A Boundary Line Adjustment (BLA) is required to combine parcels. This will need to be completed prior to final PUD/Conditional Use Permit Approval.

Response: Noted.

The following comments are fairly general in nature

Response: General comments this section noted.

11. Please see comments from engineering regarding dead-end streets. Please note that planning, in concurrence with Engineering and Traffic-related comments below is also concerned about the limited access to this site and connectivity to adjoining property.

12. SEPA status is not yet determined due to additional information required regarding transportation, etc.

13. Landscape plans for developments of more than seven thousand square feet of lot area, landscape plans shall be prepared and stamped by a licensed landscape architect, registered in the state of Washington as per 17C.200.020. Requirements for landscaping are stated in chapter 17C.200 SMC, Landscaping and Screening as well as in the PUD section of code under 17G.070.130.

14. Common Open Space must be permanently maintained by and conveyed to a homeowners' or property owners' association as regulated by state law as per 17G.070.030(E). This will need to be completed prior to final approval of the PUD/Manufactured Home Park.

15. The design standards of SMC 17C.110.500 shall apply to any common buildings within a PUD.
16. Planning will be requesting specific comments on proposed gates from The City Engineer and Fire for Hearing Examiner consideration.

17. Fencing requires a separate permit. Please also note that the PUD code indicates that the maximum height of fencing along a street frontage of the planned unit development may not exceed forty-two inches. When a fence is along a street frontage, usable pedestrian access shall be provided spaced a minimum of one every three hundred feet. See Section 17G.070.030(C)(7) Development Standards

**Integrated Capital Management (ICM):**

The following comments **must** be addressed prior to development of the site:

*Response: Issues to be addressed prior to development noted. We understand we have an acceptable alternative solution for water service to the site, in concept. Please comment on the Marshall Road alternative.*

ICM have no concerns for the sewer and stormwater.

*Response: Noted.*

The next steps for water service to the area west of Highway 195 and south of Thorpe Road include:

Step 1: Before any more development can occur in this area construction of transmission capacity and storage capacity is needed.

*Response: Noted.*
Marshall Rd transmission main is currently scheduled in the Six Year Water Program for 2022 construction but will be delayed to 2024 because of budget constraints. The pipe should be operating before Latah Glen is occupied. Construction of additional Low Pressure Zone storage at Thorpe Road is scheduled in the current Six Year Water Capital Program 2024-2025 construction but will be delayed one year.

Response: Noted.

In addition, for the area south of Qualchan Drive, Step 2 will be necessary. Construction of two booster stations approximately 3000 gpm each, 1.0 MG storage and connecting 24-inch transmission mains is necessary for development as well as completion of Step 1 projects. The Step 2 projects are not in the Six Year Water Program and have not been prioritized in the 20 year capital planning. If developers wish to proceed with development in this area, they will be required to construct these facilities to City Standards. Because planning efforts for the City's 20-year plan are currently underway, we cannot provide more detailed information of what actions the City will be taking in this area in the future.

Response: Noted.

Engineering:

The following comments **must** be addressed prior to moving forward in the Preliminary Plat and PUD process:

1. The project property is located in an area identified as having steep slopes, erodible soils, potential hazardous geology, and a Revised Site Visit Program with the Washington State Department of Ecology (Facility Site #1291079). Development of the project property will require a Critical Areas Checklist to be completed. Please review Spokane Municipal Code (SMC) 17E.040 for more information.

   Response: **Please see attached Geotechnical Report by Liberty Geotech for professional evaluation of these issues with regard to development of the project site. The report states that when geo-tech engineer recommendations are followed, the site is suitable to the proposed construction. The proponent intends to follow these recommendations.**

2. Per City of Spokane GIS mapping, the project is located within the Aquifer Sensitive Area and the Critical Aquifer Recharge Area (high). Please update the SEPA with this information.

   **Response: The attached SEPA Checklist has been amended to include this information, per this comment.**

3. Easements for utilities, e.g. power, phone, cable, etc., must be shown on the plat.

   **Response: Though not a plating action, the proposed Site Plan has been updated to include dry utility easements outside the roadway ROWs.**
4. 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.

Response: Noted, this section. It's our understanding that these comments apply to a platting action and do not apply to this Site Plan.

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.

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.

5. Road names shall be submitted for pre-approval prior to the approval of the preliminary plat and shall be identified on plat documents at the time of Final Plat submittal. Road names can be submitted for review to addressing@spokanecity.org.

Response: Noted. For clarification, this is not a plat. Proposed road names will be submitted to email address above prior to final approval.

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.

b. Addresses must be shown on the final plat. Address permits can be applied for at the City of Spokane permit center by emailing a request, including the proposed plat layout, to addressing@spokanecity.org (Please note that this comment is repeated below for final PUD plat).

Response: The site is addressed and is not being platted. Any required addressing of the lease spaces will be done prior to final approval of the site development plan for this Manufactured Home Park.
The following comments are fairly general in nature and are provided for reference during the preliminary and final plat processes. The below also includes conditions that will be associated with PUD plat approval:

**Response: General comments, this section, noted.**

1. Construction plans for 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.
   a. Civil engineered plans and profiles shall use NAVD88 datum (City of Spokane datum minus 13.13 feet).

2. 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.

3. 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 the review.

4. A $250.00 deposit will be required for each monument to be installed as part of the final plat. Monuments shall be provided in accordance with the City’s Design Standards (SMC 17H.010.170).

5. 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 of Spokane 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 this proposed project shall not be increased (rate or volume) or concentrated due to the development of the project based on a 50-year design storm. An escape route for a 100-year design storm shall be provided.
   a. Drainage plans shall be prepared and submitted for review and acceptance for the proposed development and land disturbing activities prior to issuance of any permits for site disturbance, including but not limited to grading permits and building permits. With respect to drainage plans required under subsection (C) of Spokane Municipal Code Section 17D.060.140:
      i. The volume and rate of surface water runoff after new development shall be no greater than the runoff volume and rate leaving the site prior to development, unless the director of engineering services approves the discharge of additional runoff based on a comprehensive drainage plan and down gradient impact study;
ii. Drainage plans shall include identification of all properties to be reserved for on-site stormwater facilities and the location of natural drainage systems.

b. The developer will be responsible for all costs associated with constructing stormwater improvements necessary to serve the proposed development.

c. The developer, property owner, or other responsible, authorized and designated entity acceptable to the director shall be responsible for accepting and maintaining on-site stormwater facilities. The developer shall provide a perpetual maintenance plan, including funding mechanisms and appropriate financial security for such on-site stormwater facilities acceptable to the director.

d. Acceptance of the conceptual drainage plan does not imply that the concept proposed is inherently accepted as the final design. Acceptance only implies that the applicant or (agent) has demonstrated that stormwater disposal is manageable. It does not relieve the applicant from changes to the design that may be necessary in order to comply with the City's Stormwater Ordinance and Design Standards.

e. 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.

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 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—Developer Services for review and acceptance prior to issuance of a building permit.

g. With respect to any increased stormwater flows accruing as a result of any development, each property owner, on its own behalf and the behalf of its successors in interest, fully accept without reservation, the obligation to obstruct and artificially contain and collect all natural or artificially generated or enhanced drainage flows across or upon said owner's property. The purpose of this requirement is to avoid causing or potentially contributing to flooding, erosion, or stormwater loads on other private or public properties and the public sewer systems.
h. Each property owner, on its own behalf and the behalf of its successors in interest, acknowledges and accepts full responsibility to maintain drainage facilities within all drainage easements, and to maintain and protect any on-site stormwater control facilities. Under no circumstances does the City of Spokane, its officers or agents, accept any responsibility to maintain on-site stormwater control facilities, drainage courses or drainage pipes on private lots within this development or otherwise within drainage easements or flood plain areas.

6. An erosion / sediment control plan, detailing how dust and runoff will be handled during and after construction, shall be submitted to Developer Services for review and acceptance prior to construction or land disturbing activities.

7. Only City of Spokane water shall serve the proposed development. The use of private wells is prohibited.
   a. There is an eight-inch ductile iron water main located at the northern boundary of parcel 25361.0004 available for connection.
   b. The developer will be responsible for all costs associated with design and construction of the water system necessary to serve the proposed project.
   c. All water systems, whether public or private, shall be designed to City of Spokane Design Standards.
   d. Construction plans shall be submitted to Development Services for review and acceptance. The water system, including individual service connections to each lot, shall be constructed and accepted for service prior to the City Engineer signing the final plat.
   e. General Facilities Charges, as per Spokane Municipal Code 13.04 shall be applicable to this proposed development.
   f. A hydraulic model shall be completed to prove that the design meets the minimum standards for both domestic and fire flows. See City of Spokane Design Standards Section 8.2 for more information.
   g. Residual water pressures during the fire flow demand conditions shall be designed to be no less than 20 psi at every point in the system. If static pressures exceed 80 psi, then each service line shall be required to have an individual pressure reducing valve set to reduce pressures to a maximum of 80 psi.
   h. “Wheeling” water through a private water system shall not be permitted. Water from the City's distribution system entering a private water system must not be allowed to return to the public system. A meter and double check valve assembly must be provided at each connection to the City water system.
8. Only City of Spokane sanitary sewer shall serve the proposed development. The use of on-site septic disposal systems is prohibited.
   a. There is a twenty-seven inch diameter PVC sanitary sewer main located at the northern boundary of parcel 25361.0004 available for connection.
   b. The developer will be responsible for all costs associated with design and construction of the sanitary sewer system necessary to serve the proposed project.
   c. All sanitary sewer systems, whether public or private, shall be designed to the City of Spokane standards.
   d. 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.
   e. General Facilities Charges, as per Spokane Municipal Code 13.03 shall be applicable to this proposed development.

9. Per SMC 17H.010, subdivisions comprised of more than thirty lots shall include two access points acceptable to the city fire department and director of engineering services.

10. Public / private streets, including paving, curb, sidewalk, signs, storm drainage structures/facilities, and swales/planting strips necessary to serve the proposed development, shall be designed and constructed in accordance with City standards unless otherwise approved by a design variance.
   a. Signing and striping plans, where appropriate, shall be included as part of the design submittal.
   b. Street design for the plat shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.
   c. The maximum profile grade for City streets is 8%. A variance may be granted considering topography, safety, maintainability, function, and emergency vehicle access. In no case shall the profile grade exceed 10% when a variance is granted.
   d. Garages shall be a minimum of 20 feet from the back of sidewalk to fully accommodate a parked vehicle without obstructing the sidewalk.
   e. All parking and maneuvering areas shall be hard surfaced.
   f. 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.

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

h. Public right-of-way widths shall be in accordance with the approved Design Variance, signed July 20, 2020.

i. Public rights-of-way or private tracts shall contain all street elements including paving, curbing, gutters and pedestrian buffer strips or swales in accordance with the City of Spokane Design Standards or as detailed in the approved Design Variance.

11. Per Section 17H.010.180 Sidewalks:

a. In steep, hillside areas, where development occurs only on one side of the street, sidewalk may be omitted from one side in accordance with SMC 17H.010.110. However, it must be demonstrated that the segment to be omitted is not a critical link in the sidewalk system.

b. All sidewalks shall be designed and constructed in accordance with the city’s design standards, standard plans and specifications.

12. Per Section 17H.010.190 Pedestrian Buffer Strips:

a. 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.

The following statements will be required, at minimum, 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 Development Service Center for review and acceptance prior to the issuance of a building permit on said lot.

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

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

9. The City of Spokane is not a guarantor of public improvements with respect to protection of property from flooding or damage from stormwater, excessive groundwater levels, soil erosion, movement or related risks. Notwithstanding any other provision, no special duty or obligation of the City to any identifiable person or class
pursuant to this Chapter shall ever be deemed to be created, and any duty nonetheless deemed created shall be exclusively to the general public (SMC 17D.060.210).

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

11. All drainage easements shown hereon shall be maintained by the property owner of the underlying lots. Any re-grading of the lots shall not alter the drainage of such facilities. The property owner shall maintain the drainage swales with a permanent live cover of lawn turf, with optional shrubbery and/or trees, which do not obstruct the flow and percolation of storm drainage water in the drainage swale as indicated by the approved plans. The City of Spokane and its authorized agents are hereby granted the right to ingress and egress to, over, and from all public and private drainage easements and tracts for the purposes of inspection and emergency maintenance of drainage swales and other drainage facilities. The property owner or his/her representative shall inform each succeeding purchaser of all drainage easements on the property and his/her responsibility for maintaining drainage facilities within said easements.

12. The City of Spokane does not accept the responsibility of maintaining the stormwater drainage facilities on private property nor the responsibility for any damage whatsoever, including, but not limited to, inverse condemnation to any properties due to deficient construction and/or maintenance of stormwater drainage easements on private property.

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

14. The development of any below-grade structures, including basements, may be subject to prior review of a geotechnical evaluation for foundation design to determine suitability and effects from stormwater and/or subsurface runoff. The geotechnical evaluation shall be submitted to Developer Services for review and concurrence prior to the issuance of a building permit. It must address the disposal of storm water runoff and the stability of soils for the proposed structure. This evaluation must be performed by a geotechnical engineer, licensed in the State of Washington. It must be submitted to the City Building Department and to Developer Services for review and concurrence prior to issuance of any building permit for the affected structure. An overall or phase-
by-phase geotechnical analysis may be performed in lieu of individual lot analyses to determine appropriate construction designs.

15. All public improvements (street, sewer, storm sewer, and water) shall be constructed to City standards prior to the occupancy of any structures served by said improvements.

16. 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.

17. Slope easements for cut and fill, as deemed necessary by Planning & Development in accordance with City Design Standards, are granted along all public right of ways.

18. A Transportation Impact Fee will be collected prior to the issuance of a building permit for the affected lot.

19. General Facilities Charges for new and/or upsized water and sewer services will apply to the Lots within this plat and will be collected prior to the issuance of a building permit for the affected lot.

Response: It's our understanding that these comments apply to a platting action and do not apply to this Site Plan.

Transportation:

Response: See updated Traffic Impact Analysis by Whipple Consulting Engineers which addresses Transportation comments unless otherwise responded to below.

The following comments must be addressed prior to moving forward in the Preliminary Plat and PUD process including SEPA determination:

Comments that need to be addressed from WSDOT.

1. WSDOT has reviewed the updated traffic generation and distribution letter for the proposed project. In reviewing this letter we have the following comments:
   a. Please include and discuss the existing use of the site as AAA Auto Wrecking.
   b. The trip distribution map (Figure 3) needs to be corrected to use the trip generation in the report.
   c. In comparing traffic patterns in the area, please revise trip distribution to show 60-65% heading north.

2. A traffic analysis that analyzes the development impacts at the following locations needs to be provided: site access to frontage road, Inland Empire Way/US 195 intersection, Cheney Spokane Road/US 195 Interchange, 16th Ave/US 195 Intersection, and the I90/US 195 merge point. This analysis is needed as a result of the projected
volumes that will be added to these intersections and the level of service experienced at some of these intersections.

3. Access to the US 195 Frontage Road will require that a WSDOT access permit be applied for and it be approved by WSDOT.

4. Please detail what improvements are needed on the US 195 Frontage Road to meet current City of Spokane Standards.

*Response: The plan set has been updated to include 'Concept S. Inland Empire Way Improvements' on sheet 5.*

*Comments that need to be addressed from Inga Note, City of Spokane.*

1. Regarding Traffic Study:
   a. Inga Note concurs with WSDOT’s request for additional analysis.
   b. Impact fees will be calculated using the city’s rate table for single family residential, not as proposed in the TGDL (this has also been noted as a condition of approval below).
   c. The trip distribution shown on Figure 3 does not match the totals in Table 1. On Figure 3, show the right-in, right-out movements at 195/Meadowland and the trips making the U-turn movements through the Cheney-Spokane Interchange or the Thorpe Road J-turns.
   d. Update the trip gen letter to include the latest site plan.
   e. How many trips could be diverted to bicycle mode if a pathway was built between the off-ramp and the railroad abutment so that residents can bike to the grocery store without trespassing across the tracks? Similar to the path going under the railroad overpass on the east side of 195.

2. Regarding Site Plan:

*Response: Noted*

a. We need to review improvement plans for the new city street connecting the US 195/Inland Empire Way intersection to the entrance of Latah Glen. The plans should show enough preliminary design for the continuation of this road to the south to ensure the alignment and right-of-way meet our design standards. They also need to coordinate this with WSDOT since much of the frontage road will be within WSDOT ROW and an access permit is required.

*Response: Noted. See the attached plan set, sheet 5, for Concept Inland Empire Way Improvements from the existing improvements at its intersection with US 195. This concept alignment generally follows the existing gravel road between US 195 to the east and steep slopes to the west there. The concept*
depicts the Local Access - Residential One-side Parking street width (SMC Table 17H.010-2) of 27' and does not include northbound sidewalks to discourage pedestrian access to US 195, we propose including a sidewalk only on the west side of the road, as depicted where the concept alignment curves south of the project entry toward the reserve area for Inland Empire Way shown on the Site Plan. We would anticipate the road segment north of the project entry to prohibit parking except in the case of emergency.

We should require a connection to the Meadow Mist RV property immediately west of this site in conformance with SMC 17H.010.030.G which says “street layout shall provide for future extension of streets into areas which are presently not subdivided”. See also SMC 17H.010.030.F which says “the layout of new streets shall provide for the continuation of existing streets in adjoining subdivisions. If a public street or right-of-way terminates at a plat boundary, provisions shall be made for the extension of the public street to the adjacent property or to another public street in a manner consistent with public mobility and utility infrastructure needs.” With the topography out there, it will be difficult to get access to that Meadow Mist parcel from any other direction. They have a steep hill to the west, the Latah Glen project to the south and a creek/wetland to the north. They have about 4 acres of relatively flat land (see image below). They will need an alignment for utility connections as well.

*Response: This is not a platting action.*
b. The desire for private streets should not outweigh the requirement to provide connectivity to adjacent parcels. Per SMC 17H.010.090.B “Private streets and private access require the approval of the director of engineering services. New private streets are allowed only when street connectivity is unachievable, such as property that is isolated by topography or the configuration of existing lots and streets.” Street connectivity is achievable for the Latah Glen development. It could provide public street connections to the Meadow Mist RV property and Marshall Road to the west. The proposed right-of-way dedication for a future public road continuing south to the DNR property is acceptable provided it meets City design standards. Upon completion of the US 195 study, Marshall Road is likely to be identified as a future collector arterial and plans will be made to pave and improve it to arterial standards. The development should be designed to provide a second full access to Marshall Road once it is improved. The US 195 study is evaluating several long-term changes to the corridor, such as disconnecting Thorpe Road from US 195 or changes to the layout of the Cheney-Spokane Interchange, which would make it more difficult for residents of Latah Glen to access their homes from US 195.

Response: The Site Plan has been updated to include a planned connection the Marshall Road ROW consistent with the approved private road section for this development with an emergency vehicle crash gate. If/when Marshall Road improvements are implemented as stated, this location may eventually provide a viable secondary access for the proposed site development; this is not a plat.

General Transportation Comments:

Response: General comments, this section, noted.

Comments from the Department of Natural Resources (see letter dated 11/09/2020):

1. Based on this pending SR 195 corridor study, it would seem appropriate to condition this proposal so it is consistent with the final recommendations of the corridor study to ensure appropriate traffic measures are in place.

The following comments will be noted on the plat as conditions of approvals:

2. Impact fees will be calculated using the city’s rate table for single family residential, not as proposed in the TGDL.

3. Upon review of results from the pending SR 195 Corridor Study, additional mitigation and/or conditions of approval may be added as part of the review of the preliminary PUD plat.
Fire Department:

1. North access will need to be maintained at all times for fire apparatus access.
   Response: **North access updated to approved road section.**

2. North access will need to have an approved surface approved for the weight of the responding fire apparatus.
   Response: **North access updated to approved road section.**

3. North access will need “No Parking – Fire Lane” signs on both sides of the access road.
   Response: **North access will comply.**

4. Noted that an exterior fire pit is shown for the club house. Per the Fire Code, this will need to be provided with protection to prevent users from accessing the flames.
   Response: **Fire pit at club house will comply with Fire Code.**

5. The current minimum width for a fire access lane with parking on one side is 28’. As of February 1, 2021, that will change to 27’. We will allow the 27’ road width for this project approval prior to the code change being adopted.
   Response: **Noted and appreciated.**

6. Fire hydrant placement will need to comply with the International Fire Code, with local amendments.
   Response: **Hydrant placement will comply with Fire Code and local amendments.**
**Avista**

*Response: General comments, this section, noted.*

Comments from Avista (email dated 11/25/2020) — these are general in nature.

Avista serves the area with both gas and electric distribution. Currently both parcels are subject to easements for the distribution and/or service lines and poles that lie on or across subject parcels. Any costs associated with the relocation of poles, wires or any other appurtenances will be at the cost of the owner/developer. This e-mail does not guarantee the ability to realign said facilities, and is for informational purposes only.

**Other Agency Comments**

Additional comments received that must be addressed prior to moving forward in the Preliminary PUD process including SEPA determination.

Comments from the Department of Natural Resources (see letter dated 11/09/2020):

1. Detailed information showing onsite detention of stormwater runoff to ensure that adjacent property is not negatively impacted.

   *Response: A Concept Stormwater Plan, stamped by a licensed civil engineer, has been submitted with this application.*

Additional comments received to be **conditions:**

State of Washington Dept. of Archaeology & Historic Preservation (see DAHP letter dated 10/28/2020):

1. A professional archaeological survey of the project area be conducted prior to ground disturbing activities and consultation with the concerned Tribes’ cultural committees and staff regarding cultural resource issues.

2. Submittal of survey report to DAHP for review and assessment prior to ground disturbing activities.

   *Response: Please see attached archeological survey*

Spokane Tribe of Indians (see letter Tribal historic Preservation Officer letter dated 10/29/2020):

1. Cultural survey completed by professional archaeologist in the respect of cultural resources.

2. Submittal of survey report for review and assessment prior to ground disturbing activities.
Department of Ecology (see letter dated 11/06/2020):

1. This project will require a Construction Stormwater General Permit.

Considering the need for additional information, the timeline for this application is on hold until the additional information is provided. In accordance with SMC 17G.060.090, the required information must be provided within sixty days from the notification by the department. The applicant may submit a written request for additional time to the director, any time extensions shall be in writing. If the information is not received within 60 days the application and a portion of the fees shall be returned to the applicant in accordance with SMC 08.02.0692.

If you have any questions regarding these requirements, feel free to contact me by email or phone. Please make an appointment with me to submit the revised and additional materials.

*Response: Noted. Please see attached Cultural Resources Report that indicates no eligible cultural resources were found with the recommendation to proceed with the proposed development.*

Sincerely,

[Signature]

William Sinclair, PLA, MURP
Storhaug Engineering