RE: Review of File # Z20-184PPUD (Agency Review No. 2)

Dear Mr. Nascimento:

This letter is to inform you that the application materials for the above mentioned Preliminary Plat/PUD 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 and Public Hearing.

**Planning:**

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

1. Are you planning to have individual home numbers based on a street address or a unit number with one common/primary address for the development? This is related to Engineering comments regarding addresses below.
2. Please clarify how you have calculated density. The calculation of density for a planned unit development is the net area based on the total area of subject property less the area set aside for right-of-way, tracts of land reserved for private streets and dedicated tracts reserved for stormwater facilities. The calculation of density is rounded up to the next whole number.
3. The revised plans do not appear to provide an inventory of open space as described in 17G.070.200(C)(2)(b). Please provide an inventory of natural and landscaped area and/or clarify.
4. Please clarify how the development is meeting the Common Open Space requirements per Section 17G.070.030. It appears that you have all the information needed on the plan, but planning would like to work with you to clarify the information provided as the response letter seems to suggest that more than 50% of the common open space is located within environmentally constrained land. Please contact Melissa Owen to review the open space information provided.
   a. At least ten percent of the gross area of the site must be devoted to such open space. Such space must be fully accessible to the residents, employees, visitors and/or other users of the site.
   b. Fenced yards associated with buildings immediately adjacent to designated open space, landscaping in parking lots, or fenced stormwater facilities shall not count toward the total open space requirement.
   c. 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.
5. Please clarify the following elements of the lighting plan or other schematic/illustrative detail intended to meet requirements of Section 17G.070.200(C)(9)(F) Application Process. We see that light locations have been added to the site/revised context sheets and a note indicating compliance with city standards for all signs and lights has been added. Please contact Melissa Owen regarding the following.
   a. Due to the size of the document page, it is difficult to see the light locations indicated – do you have access plan layers that might be refined/reproduced/pulled out from the larger plan set in order to produce a more easily visible lighting plan image?
   b. Do you have any additional visual aids regarding the lighting propose? I see a note in a black and white illustration for a pedestrian scale light that is also labeled as a repeating design element.
   c. Do you have access to these individual plan elements/concepts that could then be enlarged for purposes of plan review and as a general visual aid? Please contact Melissa Owen to discuss.

6. Planning is not seeing arrows added to the plan detail as indicated in the plan response letter to address a circulation plan as per 17G. 17G.070.200(C)(7)(D) Application Process. Please clarify the location of this revision. Planning will update comments related to the circulation plan as soon as possible.

The following comments are fairly general in nature and have been revised based on applicant’s response letter and revised materials intended to address planning comments.

7. Please see comments related to transportation. Planning concurrence with transportation-related comments including access to adjoining parcels (entry area) and to Marshall Road (future access point).

8. Planning is in receipt of the Design Review Boards’ (DRB) recommendations. These recommendations will be included in a future staff report for the public hearing process and included in the documents submitted to the Hearing Examiner as part of the public record for this project.

Below items are general in nature and were noted and/or responses/material provided by applicant as part of the March 4, 2021 response letter submission.

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

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

11. 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.

12. 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.

13. The design standards of SMC 17C.110.500 shall apply to any common buildings within a PUD.

14. Planning will be requesting specific comments on proposed gates from The City Engineer and Fire for Hearing Examiner consideration.

15. 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

16. Required w/in 20’ landscape buffer around the entire park boundary pursuant to Section 17C.345.120(F) - Development Standards for Mobile Home Parks

17. 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.

**Integrated Capital Management (ICM):**

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

1. ICM agrees with a distribution main in Marshall Road as a solution for water distribution to the Latah Glen project. Latah Glenn Development may choose to wait until Marshall Road Transmission construction is complete and construct a distribution main connecting to the City’s system or construct a distribution main in Marshall Road required for only their development site. See Attached ICM Evaluation Memo attached to this letter.

The following comments are general in nature (noted by applicant in 03/04/2021 response letter)

2. ICM have no concerns for the sewer and stormwater.

**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 (document for use attached).** Please review Spokane Municipal Code (SMC) 17E.040 for more information.

2. Easements for utilities, e.g. power, phone, cable, etc., must be shown on the development plan.

3. Please clarify how utility and/or access corridors (both pedestrian and vehicular) will be demarcated and defined on the plan within the development to separate leased areas from said corridors.

**General Comments and Items to be Addressed Prior to Approval of the Final P.U.D:**

4. 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.

5. 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 development.

6. Plan review fees for sanitary sewer, water, street, and stormwater improvements will be determined at the time of plan submittal and must be paid prior to the start of the review.
7. A $250.00 deposit will be required for each monument to be installed as part of the final development. Monuments shall be provided in accordance with the City’s Design Standards (SMC 17H.010.170).

8. 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 development. 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.

b. 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.

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

d. 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.

e. 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.

f. 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.

g. No building permit shall be issued for any lot in the development 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 development, 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.

h. 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.

i. 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. 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.

10. Only City of Spokane water shall serve the proposed development. The use of private wells is prohibited.

j. A 12-inch diameter distribution main from Thorpe Road to Latah Glenn development allows for growth, fire flow rates, and allows for variances for possible multi-family residential construction. The headloss violations should not continue after multiple connections to the 6-Year Marshall Rd Transmission main project is constructed, resolving this temporary issue. There is about 600 feet of existing 6-inch distribution main in Marshall Road that must be upsized for Latah Glenn Development. Latah Glenn Development may choose to upsize the 6-inch distribution to a 12-inch main or provide fire prevention measures on site until Marshall Road transmission is constructed. Latah Glenn may also confirm if 12-inch is adequate for its expected water demands.

k. The developer will be responsible for all costs associated with design and construction of the water system necessary to serve the proposed project.

l. All water systems, whether public or private, shall be designed to City of Spokane Design Standards.

m. 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 approval.

n. General Facilities Charges, as per Spokane Municipal Code 13.04 shall be applicable to this proposed development.

o. 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.

p. 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.
q. “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.

11. Only City of Spokane sanitary sewer shall serve the proposed development. The use of on-site septic disposal systems is prohibited.
   r. There is a twenty-seven inch diameter PVC sanitary sewer main located at the northern boundary of parcel 25361.0004 available for connection.
   s. The developer will be responsible for all costs associated with design and construction of the sanitary sewer system necessary to serve the proposed project.
   t. All sanitary sewer systems, whether public or private, shall be designed to the City of Spokane standards.
   u. 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 approval.
   v. General Facilities Charges, as per Spokane Municipal Code 13.03 shall be applicable to this proposed development.

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

13. 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.
   w. Signing and striping plans, where appropriate, shall be included as part of the design submittal.
   x. Street design for the development shall include supporting geotechnical information on the adequacy of the soils underneath to support vehicular design loads.
   y. 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.
   z. Garages shall be a minimum of 20 feet from the back of sidewalk, or back of the curb if sidewalk is not required, to fully accommodate a parked vehicle without obstructing the sidewalk.

aa. All parking and maneuvering areas shall be hard surfaced.
bb. 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 development.
cc. The developer will be responsible for all costs associated with constructing street improvements necessary to serve the proposed development.
dd. Roadway widths shall be in accordance with the approved Design Variance, signed July 20, 2020.

ee. 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
14. 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.

   ff. 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.

   gg. 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.

   hh. 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.

15. Per Section 17H.010.180 Sidewalks:

   ii. 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.

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

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

   kk. 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.

   ll. 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.

   mm. 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.

   nn. In cases where sidewalk has been omitted on one side of the street, the pedestrian buffer strip may also be omitted on that side.

17. Road names, if required, shall be submitted for pre-approval prior to the submittal of civil plans for designs of streets, sewer, and water. Road names can be submitted for review to addressing@spokanecity.org.

   oo. 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.

   pp. Addresses, including unit/space/lot numbers, must be shown on the development plan which will be required prior to requesting sewer and water permits. Address permits can be applied for at the City of Spokane permit center by emailing a
request, including the proposed development layout, to addressing@spokanecity.org.

The following statements will be required, at minimum, in the dedication of the final development plan:

18. Only City water and sanitary sewer systems shall serve the development; the use of individual on-site sanitary waste disposal systems and private wells is prohibited.
19. Ten foot utility easements as shown here on the described development 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.
20. 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.
21. 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.
22. 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.
23. 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/unit/space.
24. 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.
25. 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.
26. 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).
27. 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.

28. 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.

29. 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.

30. No building permit shall be issued for any lot/unitospace in this development 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 development plan, 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.

31. 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 stormwater 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.

32. 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.

33. 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.

34. 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.

35. A Transportation Impact Fee will be collected prior to the issuance of a building permit for the affected lot/unit/space.

36. General Facilities Charges for new and/or upsized water and sewer services will apply to the lots/unit/space within this development and will be collected prior to the issuance of a building permit for the affected lot/unit/space.
Transportation:

Comments that need to be addressed from WSDOT.

Items that must be addressed prior to deeming the application Technically Complete and moving onto Notice of Application and Public Comment:

In reviewing the WCE Traffic Analysis WSDOT has the following comments that will need to be addressed in a revised analysis:

1. Page 3 – The trips assigned to the US 195 on ramp need to agree between item 9 and item 11a. Please revise.
2. Page 3 – The funding and construction of the improvements at US 195 and 16th needs to be tied to plan approval and not occupancy of the last lot.
3. Page 4 – Financial Commitment is one that would secure the design and construction of the improvement in the specified time period, not a pro rata share.
4. Page 4 – Need to include frontage improvements on Inland Empire Way from access point to the US 195 intersection. This needs to be for both motorized vehicles and non-motorized means of travel. Please address in analysis.
5. Page 4 – Need to discuss public road connectivity for properties to south.
6. Page 44 – Additional information is needed regarding the assumptions that went into the development of the table on trip diversion. A discussion with WSDOT and the City is needed regarding the diversion percentages.

Items to be addressed prior to final PUD/Manufactured Home Park Application Approval:

7. Access to the US 195 Frontage Road will require that a WSDOT access permit be applied for and it be approved by WSDOT.
8. Please detail what improvements are needed on the US 195 Frontage Road to meet current City of Spokane Standards.

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

Items that must be addressed prior to deeming the application Technically Complete and moving onto Notice of Application and Public Comment:

Regarding the Traffic Study:

1. Staff does not agree with ITE Land Use 942 “Automobile Care Center” to establish vested trips for the former salvage yard. A salvage yard / impound lot does not generate that many trips. This needs to be reduced. 2 trips during AM and PM peak would be acceptable.

Regarding the Site Plan:

2. Provide detail of Marshall Road gated access and pedestrian connections.
3. Since Marshall Road will be paved in the future and could be a viable second access point, this future access location should be designed to meet queueing requirements (current design is for crash gate/emergency access only).
4. Sidewalk must be provided on the west side of Inland Empire Way to facilitate walking between the manufactured home parks and other future developments to the south. The 195 study underway with SRTC is also evaluating a future shared-use pathway to
run under the railroad bridge on the west side of 195. This would provide a walking and biking access to the commercial district on Cheney-Spokane Road.

5. The development is subject to the requirements of SMC 17H.010.030 requiring street connections to adjacent parcels. The entry cul-de-sac should be designed to public street standards with a stub to the west property line allowing for future public connection. This cul-de-sac will also function as a turnaround for city maintenance vehicles. The entry gate and keypad must be shifted to the south to meet queueing requirements. Install sidewalks on both sides of public road/cul-de-sac.

Items to be address prior to final PUD/Manufactured Home Park Application Approval:

6. Work with WSDOT on requirements for the 195 access permit and frontage road.

General comment regarding conditions of approval:

7. Traffic conditions for this development will be similar to those used for Tangle Ridge, requiring financial commitments to be in place for US 195 improvements prior to construction of any residential units.

Other Transportation Comments.

Comments from the City of Spokane Streets Department (email 03/30/2021)

1. The documents have been reviewed and the Street Department has no comments at this time.

Comments from the Department of Natural Resources (see letter dated 11/09/2020 from 1st agency comment period):

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 plans and be included as conditions of approvals based on department and agency comments received regarding transportation:

1. Impact fees will be calculated using the city’s rate table for single family residential, not as proposed in the TGDL.
2. 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/Manufactured Home Park. As noted above traffic conditions for this development will be similar to those used for Tangle Ridge, requiring financial commitments to be in place for US 195 improvements prior to construction of any residential units.

**Fire Department:**

It appears that comments from Fire (original review) have been addressed. Fire has one additional comment:

1. The gate widths in and out of the site will need to be a minimum of 14’ wide.

Original Fire Department comments that were addressed by the applicants’ revision materials and will be included as conditions of approval:

1. North access will need to be maintained at all times for fire apparatus access.
2. North access will need to have an approved surface approved for the weight of the responding fire apparatus.
3. North access will need “No Parking – Fire Lane” signs on both sides of the access road.
4. Per the Fire Code, the exterior fire pit is shown for the club house will need to be provided with protection to prevent users from accessing the flames.
5. Fire hydrant placement will need to comply with the International Fire Code, with local amendments.

**City of Spokane Treasurer:**

1. There are no LID (local improvement district fees) associated with these parcels.

**Avista**

Comments from Avista (email dated 11/25/2020) – these are general in nature and noted in applicant response letter dated 03/04/2021.

1. 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 and Department Comments:**

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

1. Note: no additional comments were received from DNR as part of the 2nd Request for Agency Review regarding the November 09, 2020 request that detailed information showing onsite detention of stormwater runoff to ensure that adjacent property is not negatively impacted.

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.

Note: Melissa Owen, City of Spokane Planning forwarded the archeological survey to DAHP on March 8, 2021 prior to the formal second request for agency review. No new information has been received at this time.

Spokane Tribe of Indians (see letter Tribal historic Preservation Officer Letter dated 03/10/2021):

3. Recommendation: Inadvertent Discovery plan into the scope of work.

Department of Ecology (see letter dated 03/29/2021):

4. 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.

Sincerely,

Melissa Owen
Assistant Planner
Development Services Center

Attachments:
City of Spokane Critical Areas Checklist
Spokane Tribe of Indians Tribal historic Preservation Officer Letter dated 03/10/2021
City of Spokane Treasurer Department email 03/18/2021
City of Spokane Fire Department email 03/23/2021
ICM Water Distribution Memo emailed 03/24/2021
WA State Dept. of Ecology Letter dated 03/29/2021
City of Spokane Engineering Memo 03/29/2021
Streets Department email 03/30/2021
City of Spokane Inga Note email 03/30/2021
WSDOT email 03/30/2021
The Shorelines/Critical Areas Checklist is to be filled out by any person preparing a Land Use Permit Application for the City of Spokane. The purpose of the checklist is to enable City staff to determine whether any potential Shoreline or Critical Areas are, or may be, present on the subject property. The information you provide will help you and reviewing agencies comply with regulations that assure the protection of public and private property, public safety, and the values and functions of environment, water quality, and fish and wildlife. This checklist does not constitute project approval.

A property owner or his/her authorized representative, must fill out the checklist, sign and date it, and submit it to the City as part of a Land Use Permit application process. The City will review the checklist and make a determination of the subsequent steps necessary to complete a Land Use Permit application.

Directions: Please fill out the checklist to the best of your knowledge. The information should be easily available from site observations, agency websites, or data available at City Hall. Maps, supporting data, drawings to scale, and photos must accompany this checklist. *Attach another sheet if more space is required.*

**APPLICANT INFORMATION**

Property Owner Name: ___________________________ Date: ______________

Address: ____________________________________________

Phone: ____________________ Email: ____________________

Agent Name: __________________________________________

Address: ____________________________________________

Phone: ____________________ Email: ____________________

**SITE INFORMATION** *(Attach area, topographical and orthographic maps, and photos)*

Site Address: ____________________________________________

Property Tax Parcel Number: ___________________________ Approx. Parcel Size: ______________

Land Use Designation: ___________________________ Zoning Designation: ____________________

*(continued on Page 2)*
Is the site currently developed?  ☐ Yes   ☐ No

If yes, list existing structures and dimensions: ______________________________________

Are you aware of any environmental studies that have been prepared related to or including the subject property or related to any property located within 300 feet of the subject property? If yes, list titles on an attached sheet.  ☐ Yes  ☐ No

Describe the project: _____________________________________________________________

Indicate whether or not the following are potentially located on-site or within 300 feet of the subject property:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fish and Wildlife Habitat</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Wetlands</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Geological Hazard</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Streams</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Floodplain or Floodway</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Critical Aquifer Recharge</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Spokane River</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Latah Creek</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

**SHORELINES** *(Provide site specific information, refer to maps and provide support data)*

Describe the general site topography. Check all that apply:

☐ Flat *(less than 5 foot elevation changes over entire site)*
☐ Rolling *(slopes on site generally less than 15% - a vertical rise of 10ft over a horizontal distance of 33-66ft)*
☐ Hilly *(slopes on site more than 15% and less than 30% - vertical rise of 10ft over horizontal distance of 33-66 ft)*
☐ Steep *(grades of greater than 30% present on site – vertical rise of 10ft over horizontal distance of less than 30ft)*
☐ Other – please describe: ______________________________________________________

Is there any surface water body or indication of surface water bodies on or in the immediate vicinity (300 feet) of the proposed site or adjacent sites? Check all that apply:

☐ Gullies
☐ Wetlands/Potential Wetlands
☐ Lakes/Ponds
☐ Creeks
☐ Rivers
☐ Drainage Ways
☐ Year-round or Seasonal Streams
Shoreline/Critical Areas Checklist

Site is primarily:
- ☐ Forested
- ☐ Meadow
- ☐ Disturbed and/or Degraded
- ☐ Shrubs
- ☐ Mixed
- ☐ Agriculture
- ☐ Urban Landscaped (lawn, shrubs, etc)

List all major natural and man-made features: ____________________________________________

ACTIVITIES
Types of Project Activities (within the shoreline jurisdiction, critical area or associated buffer):

Will activities alter man-made or natural drainage features? ☐ Yes ☐ No

Does project involve clearing, filling, grading, paving, surfacing and/or dredging? ☐ Yes ☐ No

If yes, please answer the following:

1. If activity includes paving, indicate amount of new impervious areas: _________________

2. If activities include clearing and grading, indicate square feet: _________________

3. Will activities involve placing fill materials? ☐ Yes ☐ No
   If yes, will fill materials exceed one foot in depth? ☐ Yes ☐ No Depth: ______

4. If fill materials exceed 50 cubic yards, indicate cubic yards: _________________

5. If activities involve earth removal exceeding 2 feet in depth excluding foundation excavation, indicate depth: _________________

DISCLAIMER AND SIGNATURE
I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the agency must withdraw any approvals that it might issue in reliance upon this checklist.

Signature: ___________________________________________ Date: ________________

For Use by Agency

Received by: ___________________________________________ Date: ________________

Reviewed by: ___________________________________________ Date: ________________

Development Services Center  808 West Spokane Falls Boulevard, Spokane, WA 99201-3336
my.spokanecity.org  |  Phone: 509.625.6300  |  Fax: 509.625.6822
March 10, 2021

To: Melissa Owen, Planner

RE: Latah Glen Community

Ms. Owen,

Thank you for contacting the Tribe’s Historic Preservation Office, we appreciate the opportunity to provide a cultural consult for your project, the intent of this process is to preserve and protect all cultural resources whenever protection is feasible.

After a cultural survey was completed in the project mention above, I have no further concern.

**Recommendation: Inadvertent Discovery plan into the scope of work.**

This letter is your notification that your project has been cleared, and your project may move forward.

As always, if any artifacts or human remains are inadvertent discovered this office should be immediately notified and the work in the immediate area cease.

Should additional information become available or scope of work change our assessment may be revised,

Again, thank you for this opportunity to comment and consider this a positive action that will assist in protecting our shared heritage.

If questions arise, please contact me at (509) 258 – 4222.

Regards,

Randy Abrahamson
Tribal Historic Preservation Officer (T.H.P.O.)
One more time,

There are no LIDs associated with these parcels.

Thanks!

Chris Van Gelder  |  Treasury Accounting Clerk
509.625.6091  |  spokanecity.org
Good morning.

It appears that comments from Fire have been addressed. We have one additional comment. The gate widths in and out of the site will need to be a minimum of 14’ wide.

Starting February 1, 2021, the 2018 International Fire Code with State and Local Amendments will be in effect.

I am currently working remotely and will respond to emails as soon as possible. Your patience is appreciated.

David F. Kokot, P.E. | Spokane Fire Department | Fire Protection Engineer
509.625-7056 | fax 509.625.7006 | dkokot@spokanefire.org | spokanefire.org
Melissa, attached is our analysis. We agree with a distribution main in Marshall Road. What else do you need from me?

Marcia Davis
509.625.6398
(working remotely cell phone 509-570-4162)
Latah Glenn Development

Alternative Water System Pipe Routing

**Purpose:** To compare the two Latah Glenn Development water main connections of the Marshall Road route (MRR) to the Inland Empire Way route (IEWR) and determine size of main

**Background:** The Low pressure zone is outlined in the Figure 1, as shown below. The Low pressure zone supplies a large portion of Spokane’s water, but branches to the south to serve the Hangman Valley, Vinegar Flats, and Eagle Ridge area. These areas are served by a singular 24-inch diameter transmission.

![Figure 1. Map of Low Pressure Zone](image_url)
The two alternative connection routes proposed by Latah Glenn Development are shown below in Figure 2. The MRR connection would supply water demands from the transmission main in Thorpe Road at Marshall Road. The IEWR would be supplied from the Inland Empire Way transmission main through a network of smaller distribution mains of varying diameters in the Vinegar Flats area.

**Assumptions:**

- Approved plats that are not fully constructed are included in this analysis.
- The proposed 6-Year Marshall Rd transmission main is not included in the model analysis. Currently it is scheduled for construction in 2024.
- Latah Glenn Development includes 150 units with a Club House for an average daily demand of 100 gpm.
- Fire flow rates for this area could range from 1,000 gpm to 3,000 gpm. For this analysis, the fire flow was assumed to be 2,000 gpm for general area (not just Latah Glenn’s needs).
State Standards and City Guidelines:

- City design standards: velocity less than or equal to 5 feet per second at maximum day demand in distribution mains and no more than 15 feet per second during fireflow conditions.
- Washington Department of Health Water System Design Manual (WADOH WSDM) maximum pipe velocity during peak hour demand is not to exceed 8 feet per second. WADOH WSDM recommends a water hammer analysis whenever velocities exceed 8 fps.
  - AWWA guidelines 2017 recommends water hammer analysis for distribution piping designed to exceed 5 fps during PHD or fire-flow conditions
  - WAC 246-290-230(9) requires water hammer analysis when a transmission main is designed to operate at 10 fps or more.
- AWWA guidelines (M32): headloss is less than or equal to 6 feet per 1000 feet in distribution mains.
- 20 psi minimum distribution system pressure during maximum day demand with fire flow (WAC 246-290-230(6), AWWA M32)
- 30 psi minimum distribution system pressure during peak hour demand (WAC 246-290-230(5))
- 45 – 100 psi distribution system pressure during maximum day demand (City design standards and Water System Plan 2016)
- WADOH WSDM requires a minimum 200 gallons emergency (standby) storage per ERU.
- Qualchan and Thorpe Storage must have sufficient storage to meet emergency demands during summer operations.
  - The development must not worsen poor conditions at any storage

Analysis:

The Spokane Master 2020 water model was utilized to compare the impact of each proposed connection for the Latah Glenn Development. The existing peak hour (PHD) scenario, existing maximum daily demand with fireflow (MDD + FF), MDD and Existing Extended Period Summer (EPS Summer) scenarios were all reviewed to compare the two alternative connection routes. Generally, there were no pressure concerns found that Latah Glenn development created during this analysis.

Pipe Model Results:

Narrative for Main Model Results: The pipe network experiences high head losses and maximum allowed velocity during fire flow conditions greater than current standards when a Latah Glenn Development connects to the IEWR. This route does not meet AWWA design standards.

The model network experiences less stress in the Hangman Valley area when the Latah Glenn’s demands are provided by the MRR connection. This route will meet City Design standards and AWWA design standards for fire flow conditions if the section of 6-inch pipe in the existing water distribution system is replaced with a 12-inch diameter. Considering growth, fire flow demands, and future connection to the proposed Marshall Road transmission main capital project, a 12-inch diameter main is a minimum diameter required for a distribution in Marshall Road. High headloss shown from the model results is not expected to be experienced after the transmission is installed and several connections are made between the transmission and distribution.

The pipe network of this area as well as 6-inch pipes of concern are shown in Figure 3. Selected distribution main sections are highlighted in Table 1, Table 2 and Table 3 where the water system
experiences greater than current design criteria for PHD, MDD + FF and MDD conditions for each alternative connection. The table does not list every pipe that experiences above design criteria standards but provides examples of model results in specific areas. The values with red text are specifically beyond and do not align with design standards. Also, the tables show that 6-inch diameter distribution supply is not adequate to serve fireflow plus MDD for the area in general.

Figure 3. Network Focus Area
Table 1. PHD Model Scenario Results for Each Route

### Modeling Scenario PHD Mains Results Headloss and Velocity

<table>
<thead>
<tr>
<th>Alt Route</th>
<th>Pipe ID</th>
<th>Diameter (Inch)</th>
<th>Headloss (ft/1000ft)</th>
<th>Velocity (fps)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AWWA, WAC, WSDOH &amp; City Standards and Guidelines for Scenario</td>
<td>WMN147947</td>
<td>6</td>
<td>30</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>WMN78455</td>
<td>8</td>
<td>6.3</td>
<td>6</td>
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<tr>
<td>Proposed Latah Connection</td>
<td>8</td>
<td>4</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>IEWR</td>
<td>WMN78406</td>
<td>6</td>
<td>6</td>
<td>26</td>
</tr>
<tr>
<td></td>
<td>WMN78406</td>
<td>12 (upsized)</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

### Modeling Scenario PHD Mains Results Pressure

<table>
<thead>
<tr>
<th>Alt Route</th>
<th>Pressure Zone or Area</th>
<th>Junction</th>
<th>Lowest Pressure Served (ID)</th>
<th>(psi)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AWWA, WAC, WSDOH &amp; City Standards and Guidelines for Scenario</td>
<td>Low/Hangman Flats</td>
<td>WHY8242 (Service for Latah Glenn)</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>IEWR</td>
<td>Low in Eagle Ridge Area</td>
<td>WFT1796</td>
<td>47</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cedar</td>
<td>WSV11737</td>
<td>24</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eagle Ridge 1</td>
<td>J81754</td>
<td>70</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eagle Ridge 2</td>
<td>WSV15564</td>
<td>53</td>
<td></td>
</tr>
<tr>
<td>MRR</td>
<td>Low/Hangman Flats</td>
<td>Proposed Hydrant at Latah Glen with 12” Distribution</td>
<td>71</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Low in Eagle Ridge Area</td>
<td>WFT1796</td>
<td>47</td>
<td></td>
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<tr>
<td></td>
<td>Cedar</td>
<td>WSV11737</td>
<td>24</td>
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<td>Eagle Ridge 1</td>
<td>J81754</td>
<td>70</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Eagle Ridge 2</td>
<td>WSV15564</td>
<td>53</td>
<td></td>
</tr>
</tbody>
</table>
Table 2. MDD + FF Model Scenario Results for Each Route

<table>
<thead>
<tr>
<th>Modeling Scenario MDD + FF Mains Headloss and Velocity Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alt Route</td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td></td>
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<tr>
<td>AWWA,WAC, WSDOH &amp; City Standards and Guidelines for Scenario</td>
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<tr>
<td>IEWR</td>
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<tr>
<td></td>
</tr>
<tr>
<td>MRR</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Modeling Scenario MDD + FF Mains Results Pressure</th>
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</thead>
<tbody>
<tr>
<td>Alt Route</td>
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<tr>
<td>-----------</td>
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<tr>
<td></td>
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<tr>
<td>AWWA,WAC, WSDOH &amp; City Standards and Guidelines for Scenario</td>
</tr>
<tr>
<td>IEWR</td>
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<td>MRR</td>
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</tbody>
</table>
Table 3. MDD Model Scenario Results for Each Route

<table>
<thead>
<tr>
<th>Modeling Scenario MDD Mains Headloss and Velocity Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alt Route</td>
</tr>
<tr>
<td>----------------</td>
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<tr>
<td></td>
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<tr>
<td>AWWA, WAC, WSDOH &amp; City Standards and Guidelines for Scenario</td>
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<tr>
<td>IEWR</td>
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<tr>
<td></td>
</tr>
<tr>
<td>MRR</td>
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<tr>
<td></td>
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</tbody>
</table>

Storage Model Results:

Narrative for Storage Model Results:

The SCADA information from the City’s Water Department shows that it is difficult to keep the Qualchan tank above the bottom of the operating level during the summer usage time periods. Tank water levels dropped below emergency water storage levels a handful of times from 2015 to 2018. Since 2019, more residential homes have been constructed and the area continues to develop with approved plats. It is necessary to operate the Latah Booster pump at higher speeds to keep up with summer peak demand. The increased pumped flow tends to fill Thorpe Storage first because of closer proximity and lower head loss.

The EPS Summer model results show that Qualchan water level actually drops below dead storage elevation with the existing conditions, intertie demands and the approved platted residential homes. Also, Latah booster was set at 100% in the model to provide its design flow rate of 16,000 gpm. This setting is not done in practice because most likely due partially activated intertie demands (Airway Heights) or inactivated intertie demands during the 2015-2019 period. Additionally, the 30-inch and 24-inch supply and feed transmission main size would experience velocities and head losses greater than design standards and guidelines. Model and SCADA data results are shown in Figure 4 and 5 for Qualchan, respectively. Model and SCADA data results are shown in Figure 4 and 5 for Thorpe, respectively.

The model results show that there is lesser impact to the Thorpe Storage with MRR connection, than the impact the of the IEWR has on the Qualchan Storage. If IEWR connection is constructed, then the Latah Glenn Development must rely on development of the Qualchan Twin’s storage to provide adequate fire flow volume storage, which is already a struggle for the system. Available emergency water volumes in Qualchan and Thorpe Storage areas are expected to be increased in the future with construction of two new reservoirs. A Thorpe Twin storage reservoir is planned in the 6-Year Water Capital Program. A Qualchan Twin Storage was proposed by the Marshall Creek Development project. The model results can be seen in the two graphs below.
Figure 4. EPS Model Results for Qualchan Storage

Figure 5. 2015 through 2018 SCADA Data Results for Qualchan Storage
Figure 6. EPS Model Results for Thorpe Storage

Figure 7. 2015 through 2018 SCADA Data Results for Thorpe Storage
**Conclusion:**

Based on the information from this analysis, the Marshall Road connection route is the preferred alternative for Latah Glenn. The distribution route in Marshall Road provides the lesser impact to the water system when compared to Inland Empire Route. There is a slight impact to the Thorpe Storage with the MRR alternative but does not negatively impact the Thorpe storage’s ability to refill. The impact to the Qualchan storage with the IEWR alternative is noticeable and does impact the Qualchan storage’s ability to refill. SCADA data shows that Thorpe Road tank is not as challenging to keep above the bottom of the operating range compared to Qualchan tank during the peak of the summer. Latah Glenn development will have a more direct route to Thorpe Reservoir for emergency storage. This route also allows the Latah Glenn Development to develop before the construction of the Marshall Road transmission main.

A 12-inch diameter distribution main from Thorpe Road to Latah Glenn development allows for growth, fire flow rates, and allows for variances for possible multi-family residential construction. There is about 600 feet of existing 6-inch distribution main in Marshall Road that must be upsized for Latah Glenn Development. Latah Glenn Development may choose to either wait until Marshall Road Transmission is construction is complete and construct a distribution main required for only their development site. Latah Glenn Development may also choose to upsize the existing 6-inch distribution to a 12-inch main and construct additional 12-inch distribution main to their development site to start construction as soon as possible. Lastly, Latah Glenn Development may also choose to provide fire prevention measures on site and build an adequate distribution main required for its development and the City will pay to upsize the distribution to a 12-inch distribution main.
Hello;

Ecology submits the attached comments for your project.

If you have any questions regarding the comments made, please contact the staff member listed in the attached letter.

For SEPA process questions, please contact Cindy Anderson, ERO SEPA Planner at (509) 329-3442 or via email at Cindy.Anderson@ecy.wa.gov.

Please continue to submit SEPA proposals and accompanying documents to the SEPA Register at separegister@ecy.wa.gov.

Thank you.

Melanie Kincheloe (she/her/hers)
Administrative Assistant
Shorelands & Environmental Assistance Program
Eastern Regional Office
melanie.kincheloe@ecy.wa.gov
Work: (509) 329-3410 ~ Cell: (509) 703-0426

To conserve paper please don’t print this e-mail unless you really need to.

This communication is a public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.
March 29, 2021

Melissa Owen  
Assistant Planner  
City of Spokane Planning & Development  
808 West Spokane Falls Boulevard  
Spokane, WA 99201-3329

Re: Latah Glen Residential Community, 2nd Review, File: Z20-184PPUD

Dear Melissa Owen:

Thank you for the opportunity to provide comments regarding the construction of a 157-space manufactured home park with clubhouse, laundry, an interconnect pedestrian system and open space. The project includes construction of associated roads, driveways, utilities, lease space, building foundations and stormwater facilities (Proponent: Sycamore Canyon Group, LLC.). After reviewing the documents, the Department of Ecology (Ecology) submits the following comments:

**Hazardous Waste and Toxics Reduction Program-Andrew Maher (509) 329-3612**

Please keep in mind that during the construction activities associated with the Latah Glen Residential Community 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


The applicant, as the facility generating the waste, bears the responsibility for all construction waste.

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 Andrew Maher at (509) 329-3612 or via email at [Andrew.Maher@ecy.wa.gov](mailto:Andrew.Maher@ecy.wa.gov).
Solid Waste Management Program-Martyn Quinn (509) 329-3435

Section B.8.d in the SEPA Checklist states that the applicant proposes to demolish all existing structures as a part of the construction activities involved with the development of the Latah Glen Residential Community.

Section B.7.a of the SEPA checklist asks if any environmental health hazards exist that could occur as a result of the proposed development of the Latah Glen Residential Community. Improper disposal of solid waste, including demolition waste, can result in environmental health hazards. Ecology encourages the applicant to salvage, reuse, and recycle as much of the waste as possible. Recycling demolition debris typically costs less than disposal. Otherwise, the applicant must dispose of demolition waste at a permitted solid waste facility.

For more information, please contact Martyn Quinn at (509) 329-3435 or via email at Martyn.Quinn@ecy.wa.gov.

Water Quality Program-Shannon Adams (509) 329-3610

As stated in the previous letter regarding the Latah Glen Residential Community project in November 2020, Ecology will require the applicant to obtain a Construction Stormwater General Permit.

For more information or technical assistance in obtaining a Construction Stormwater General Permit, please contact Shannon Adams at (509) 329-3610 or via email at Shannon.Adams@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.

To receive more guidance on or to respond to the comments made by Ecology, please contact the appropriate staff listed above at the phone number or email provided.

Department of Ecology
Eastern Regional Office
(Ecology File: 202101316)

cc: William Sinclair, Storhaug Engineering
MEMORANDUM

DATE: March 29, 2021
TO: Melissa Owen, Assistant Planner
FROM: Joenie Eliason, Engineering Technician IV – Development Services
THROUGH: Mike Nilsson, P.E., Senior Engineer – Development Services
File No: Z20-184PPUD
SUBJECT: Latah Glen Community Conditional Use Permit and SEPA

Conditional Use Permit and SEPA Comments

Items to be addressed prior to approval of preliminary P.U.D.:

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.

2. Easements for utilities, e.g. power, phone, cable, etc., must be shown on the development plan.

3. Please clarify how utility and/or access corridors (both pedestrian and vehicular) will be demarcated and defined on the plan within the development to separate leased areas from said corridors.

General Comments and Items to be Addressed Prior to Approval of the Final P.U.D:

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.

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 development.

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 development. 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 the Project Engineer’s recommendations based on the drainage plan accepted for the final development. 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 development 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 development, 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. A 12-inch diameter distribution main from Thorpe Road to Latah Glenn development allows for growth, fire flow rates, and allows for variances for possible multi-family residential construction. The headloss violations should not continue after multiple connections to the 6-Year Marshall Rd Transmission main project is constructed, resolving this temporary issue.
There is about 600 feet of existing 6-inch distribution main in Marshall Road that must be upsized for Latah Glenn Development. Latah Glenn Development may choose to upsiz e the 6-inch distribution to a 12-inch main or provide fire prevention measures on site until Marshall Road transmission is constructed. Latah Glenn may also confirm if 12-inch is adequate for its expected water demands.

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 approval.

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 approval.

e. General Facilities Charges, as per Spokane Municipal Code 13.03 shall be applicable to this proposed development.

9. Per SMC 17H.010, developments comprised of more than thirty lots or units 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 development 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, or back of the curb if sidewalk is not required, to fully accommodate a parked vehicle without obstructing the sidewalk.

e. All parking and manuvering 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 development.

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

h. Roadway 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. 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.

   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.

12. 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.

13. 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.
14. Road names, if required, shall be submitted for pre-approval prior to the submittal of civil plans for design of streets, sewer, and water. Road names can be submitted for review to addressing@spokanecity.org.

   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, including unit/space/lot numbers, must be shown on the development plan which will be required prior to requesting sewer and water permits. Address permits can be applied for at the City of Spokane permit center by emailing a request, including the proposed development layout, to addressing@spokanecity.org.

The following statements will be required, at minimum, in the dedication of the final development plan:

1. Only City water and sanitary sewer systems shall serve the development; 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 development 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/unit/space.

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/unit/space in this development 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 development plan, 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/unit/space.
19. General Facilities Charges for new and/or upsized water and sewer services will apply to the lots/units/spaces within this development and will be collected prior to the issuance of a building permit for the affected lot/unit/space.

cc: Developer Services File
Kris Becker, P.E., Manager, Development Services
John Sawyers, P.E., Principal Engineer, Development Services
Eldon Brown, P.E., Principal Engineer, Development Services
Patty Kells, Traffic Engineering Assistant, Development Services
Erik Johnson, Engineering Technician IV, Development Services
Hi Melissa,

The documents have been reviewed and the Street Department has no comments at this time.

Best regards,

Bobby Halbig
City of Spokane | Engineering Technician III, Traffic Operations
509.232-8846 | fax 509.232.8830 | bhalbig@spokanecity.org | spokanecity.org

From: Owen, Melissa <mowen@spokanecity.org>
Sent: Wednesday, March 17, 2021 10:21 AM
Subject: Request for Comments ***2nd Review*** - Latah Glen Residential Community Manufactured Home Park (Z20-184PPUD) - Comments Due March 30, 2021

Good Morning,

After a request to the applicant for additional information, they have submitted additional and revised materials for the above referenced application. Please find attached Request for Comments – 2nd Review, Technically Incomplete Letter, Applicant Response Letter, Amended SEPA, Cultural Resource Survey, and Traffic Impact Analysis (report body) for the below project. Due to the size of documents submitted, not all documents are attached to this email. The project webpage linked below includes additional materials for your review including revised site and context plans, full traffic impact report, geotechnical engineering report, Cultural Resource Survey, original application submittal documents including other technical reports and memos, conceptual utility plans, Design Review Board documents, etc. for the following project:

Project Name: Latah Glen Residential Community Manufactured Home
Website: https://my.spokanecity.org/projects/latah-glen-residential-community/
Permit # Z20-184PPUD
Site Address: 3504 S Inland Empire Way and 1925 W 36TH (parcels 25361.0004; 25364.0001).
Melissa,

Here are my comments. I wanted to ask the other reviewers about the Marshall Road gate. See highlighted question.

Thanks

Inga

Site Plan Comments

- Provide detail of Marshall Road gated access and pedestrian connections. Question for the group – Since Marshall will be paved in the future and could be a viable second access, should this gate be set up to meet queueing requirements as well? Right now it's just a crash gate.
- Work with WSDOT on requirements for the 195 access permit and frontage road.
- Sidewalk must be provided on the west side of Inland Empire Way to facilitate walking between the manufactured home parks and other future developments to the south. The 195 study underway with SRTC is also evaluating a future shared-use pathway to run under the railroad bridge on the west side of 195. This would provide a walking and biking access to the commercial district on Cheney-Spokane Road.
- The development is subject to the requirements of SMC 17H.010.030 requiring street connections to adjacent parcels. The entry cul-de-sac should be designed to public street standards with a stub to the west property line allowing for future public connection. This cul-de-sac will also function as a turnaround for city maintenance vehicles. The entry gate and keypad must be shifted to the south to meet queueing requirements. Install sidewalks on both sides of public road/cul-de-sac.

Traffic Study Comments

- Staff does not agree with ITE Land Use 942 “Automobile Care Center” to establish vested trips for the former salvage yard. A salvage yard / impound lot does not generate that many trips. This needs to be reduced. 2 trips during AM and PM peak would be acceptable.
- Traffic conditions for this development will be similar to those used for Tangle Ridge.
Good Morning Melissa,

What you have put together below looks good to us. Thank you for noting the comments from the initial agency review.

Thanks again,

Greg

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Thank you Greg. I wanted to clarify that I should also keep comments from the original review such as the requirement for an access permit to US 195 which are not identified below. Here is what I’m thinking – I’ve attached your comments from the initial agency review period in cast this is helpful. Let me know if you would like any changes to the below. Thank you.

Items that must be addressed prior to deeming the application Technically Complete and moving onto Notice of Application and Public Comment:

In reviewing the WCE Traffic Analysis WSDOT has the following comments that will need to be addressed in a revised analysis:

1. Page 3 - The trips assigned to the US 195 on ramp need to agree between item 9 and item 11a. Please revise.
2. Page 3 - The funding and construction of the improvements at US 195 and 16th needs to be tied to plan approval and not occupancy of the last lot.
3. Page 4 - Financial Commitment is one that would secure the design and construction of the improvement in the specified time period, not a pro rata share.
4. Page 4 - Need to include frontage improvements on Inland Empire Way from access point to the US 195 intersection. This needs to be for both motorized vehicles and non-motorized means of travel. Please address in analysis.
5. Page 4 - Need to discuss public road connectivity for properties to south.
6. Page 44- Additional information is needed regarding the assumptions that went into the development of the table on trip diversion. A discussion with WSDOT and the City is needed regarding the diversion percentages.

To be address prior to final PUD/Manufactured Home Park Application Approval:
7. Access to the US 195 Frontage Road will require that a WSDOT access permit be applied for and it be approved by WSDOT.
8. Please detail what improvements are needed on the US 195 Frontage Road to meet current City of Spokane Standards.

I will be working remotely until further notice and will respond to emails as quickly as possible. Thank you for your patience!

From: Figg, Greg <FiggG@wsdot.wa.gov>
Sent: Tuesday, March 30, 2021 2:02 PM
To: Owen, Melissa <mowen@spokanecity.org>
Cc: Kay, Charlene <KayC@wsdot.wa.gov>; Note, Inga <inote@spokanecity.org>; Kells, Patty <pkells@spokanecity.org>; Frostad, Larry <FrostaL@wsdot.wa.gov>
Subject: Latah Glen Traffic Analysis Comments

Good Afternoon Melissa,
Thank you for the opportunity to review the WCE traffic analysis for the above project. In reviewing the WCE Traffic Analysis WSDOT has the following comments that will need to be addressed in a revised analysis:

Page 3 - The trips assigned to the US 195 on ramp need to agree between item 9 and item 11a. Please revise.
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Please address in analysis.
Page 4 - Need to discuss public road connectivity for properties to south.
Page 44- Additional information is needed regarding the assumptions that went into the
development of the table on trip diversion. A discussion with WSDOT and the City is needed
regarding the diversion percentages.

Please let me know if you should have any questions about the above comments.
Sincerely,

Greg Figg
Development Services Manager
WSDOT Eastern Region Planning
2714 N. Mayfair Street
Spokane, WA 99207
(509) 324-6199
figgg@wsdot.wa.gov