



April 1, 2020

Job No. 1352-023-019

RESUBMITTED

Apr 09 2020

CITY OF FEDERAL WAY
COMMUNITY DEVELOPMENT

Ms. Becky Chapin
Senior Planner
City of Federal Way
33325 8th Avenue S
Federal Way, WA 98003

**RE: #19-105072-SU, 19-105073-SE, & 19-105074-UP
The Woodlands at Redondo Creek Preliminary Plat
Public Comments Responses**

Dear Ms. Chapin:

On behalf of RMJ Holdings, LLC, ESM Consulting Engineers, LLC is providing this letter as a formal response to the public comments we received from the City of Federal Way on February 19, 2020.

The City of Federal Way received 3 public comments regarding this project. Below is a summary of each topic of concern from the public comments with our response. A matrix of respondents and their topic of concern (identified based on numbers correlated with topic from below) is provided at the end of this letter.

1. TRAFFIC, ROAD SAFETY AND SIGHT DISTANCE

Public commenters expressed concern regarding additional traffic from the proposed development overloading S 304th Street and the surrounding neighborhood. A *Traffic Impact Analysis* was prepared for this project by Traffex, dated September 28, 2019. Further, the City ran a transportation concurrency test for the proposed project. A proposal of 68 single-family residential lots “passed” the concurrency test, resulting in a *Capacity Reserve Certificate* for the project site under file #19-104256-CN. FWRC 19.90.130 provides standards for transportation concurrency to ensure traffic generated by the project plus existing city road facilities meet the City’s transportation Level of Service (LOS), including applicable intersections impacted by the development.

In addition to the proposed roads internal of the project meeting the City’s road standards, half-street improvements will be made to 20th Avenue S and S 304th Street at the frontage of the subject property, including a future turn lane on 304th Street. These improvements also provide adequate sight distance from all impacted intersections, with substantial improvement to sight distance of the 20th Avenue and 304th Street intersection. Traffic calming devices will be provided on the roadways internal to the development to minimize opportunities for vehicles to speed through the new road connection. Finally, this project is subject to pay Traffic Impact Fees to the City of Federal Way at time of building permit issuance to help finance the City’s transportation infrastructure. Refer to sheet PP-06 and PP-07 of the Preliminary Plat plan set for more details.

2. PEDESTRIAN ACCESS

Neighbors to the project have concern about safe pedestrian access for residents within and surrounding the development due to a lack of sidewalks. Aligning with the City's road standards, this project proposes to provide sidewalks on all roads to be developed within the project. The internal sidewalks will connect to the existing 20th Avenue S that connects to 304th, where an 8' wide sidewalk will be provided along the S 304th Street frontage to the subject property. Additionally, an extruded curb will be provided along the shoulder of 304th to the existing commercial business driveway near the corner of Pacific Highway S. Refer to sheets PP-06 and PP-07 of the Preliminary Plat plan set for more details.

3. SCHOOL CAPACITY

Prior to submitting the preliminary plat application to the City, we have been in contact with the Federal Way School District regarding this project proposal. The District's contacts have not expressed concerns regarding student capacity as a result of this development. The applicant is subject to pay School Impact Fees to school district at time of building permit issuance to support growth within the school district.

4. WATER AND SEWER

Commenters expressed their concern regarding the lack of water pressure in the neighborhood, with an assumption that the proposed development impacts the surrounding water pressure. We contacted Lakehaven Utilities regarding this concern - Brian Asbury, development engineering supervisor, stated, "*Lakehaven is currently studying 'hilltop' areas within our service area, to determine what (if any) improvements may be needed to existing water systems. In these 'hilltop' areas, available service pressure at meters is typically around 40 psi, which is Lakehaven's stated low-pressure figure (i.e., a goal). However, virtually all properties in these 'hilltop' areas have available service pressure above what is required by statute (e.g., 30 psi at static conditions, etc.). The study will take a couple of years before completed, and at that time we'll identify any needed capital improvement projects.*

The development of the subject plat won't impact system pressures at all...pressure is pressure and is determined almost exclusively by elevation in relation to the level of water in the supplying tank.

In response to a couple of the comments you included:

- *Concurrent shower & laundry use having a noticeable impact is typically more associated with a supply meter/line size issue, and not a pressure issue. The size issue could simply be too small diameter of pipe or older pipe where pipe diameter has decreased over the years due to scale build-up (this condition will also scrub off some pressure psi).*
- *Source (well) water is pumped up to tanks. However, properties are served by gravity head down from the tanks. There is no direct connection (in this area) of properties/buildings to 'pumped' source water."*

A commenter also had concern for an alleged sewer treatment capacity. To this, Brian with Lakehaven explained, "*Lakehaven does not have any sewer system facility (pipe, pump station, treatment plant, etc.) that is at or over capacity, nor do any current system capacity levels trigger any statutory system studies &/or upgrades. Lakehaven is constantly reviewing & upgrading the water & sewer systems as necessary under our Capital Improvement Program projects, to meet the current & future system demands.*"

The applicant is subject to pay applicable Developer Extension and Latecomer fees associated with extending and connecting to the Lakehaven infrastructure, in addition to any construction and permit costs.

5. HOMELESS ENCAMPMENT

The applicant is currently working with the City staff to develop a plan that will minimize or eliminate homeless trespassing on the subject property. This issue has been historically ongoing throughout the City and on this project site, far before the applicant took ownership of the site. The applicant is interested in taking appropriate measures that will help create a safer and cleaner environment for new and existing residents surrounding the property.

The critical areas and buffers onsite will have enhanced protection from trespassers with the installation of split rail fencing and Native Growth Protection signs around their respective perimeters. Further, currently degraded areas on site due to the homeless encampments will be cleared of debris and planted with native vegetation as part of the buffer enhancement and restoration efforts of this project.

6. TREE RETENTION - NOISE AND HABITAT

A neighbor commented their concerns of additional noise to the surrounding environment and a reduction of natural habitat due to tree removal from this project. This project proposes to follow the City's tree retention requirements found in FWRC 19.120.130. Trees within the wetland, stream and their buffers will not be removed to preserve natural habitat. Tree removal will occur within the developing area of the site, approximately 72% of the subject property. Tree replacement will be dispersed throughout designated public purpose tracts, and mitigation plantings will occur within the wetland buffer. Further, by providing approximately 28.7 tree units per acre, this project proposes to exceed the City's trees retention requirements.

The subject property was evaluated by two professional ecologists - the project's consultant and the City's consultant. No endangered species or their habitats were observed onsite. The stream is a non-fish bearing stream due to a natural fish barrier. Their inventory research did not result in any indication of endangered species on the site. The Washington State Department of Fish and Wildlife Priority Habitat Map shows the wetland on site as a priority habitat, as with every identified wetland in the state.

Refer to the *Tree Conservation Plan*, the *Landscape Plan* sheets included with the Preliminary Plat plan set and the *Critical Area Report and Mitigation Plans* for more details.

7. NATURAL ENVIRONMENT - WETLAND, STREAM AND STEEL LAKE

Impacts to the natural environment on and around the subject property are appropriately addressed and mitigated for by following the City of Federal Way standards found in FWRC 19.145. The applicant's ecology consultant and the City's third-party ecology consultant have reviewed the site conditions and state inventory data, and applied state and local requirements to analysis and conclusions for both existing conditions and proposed measures. Please refer to the project's *Critical Areas Report and Mitigation Plan* prepared by Sewall Wetland Consulting.

Public Record Respondent / Commenter	Parcel Number	Date	Concerns
Anne Etter	798280-0090	12/05/2019	1, 7
Laurie Ault-Sayan	798300-0120	01/02/2020	1, 2, 3, 4, 5, 6, 7
Ricardo Kelly	367440-0186	01/06/2020	2, 4



Ms. Becky Chapin
April 1, 2020
Page 4

If there are any questions or a need for further clarification, please feel free to contact me at (253) 838-6113 and I would be happy to discuss them with you.

Sincerely,

ESM CONSULTING ENGINEERS, L.L.C.



SAVANNA NAGORSKI, MS
Planner/GIS Analyst

Enc: As noted
cc: Dmitriy Mayzlin (w/Enc)
Justin Lagers

g:\esm-jobs\1352\023\019\document\letter-011.docx

