



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
Parcels 042104-9012 & -9221 - Technical Review Comment Response**

Dear Ms. Chapin:

ESM Consulting Engineers, LLC is providing this letter in response to the review letter we received from the City of Federal Way, dated February 19, 2020. Note that the proposal has been decreased by 1 unit, now totaling 67 single-family lots.

The following is a list of items included with this submittal:

Preliminary Plat:

- 1) Comment Response Letter (this letter);
- 2) Revised SEPA Checklist;
- 3) Critical Areas Memo with Mitigation Plans;
- 4) Revised Tree Conservation Plan;
- 5) Revised Geotechnical Engineering Report;
- 6) ROW Modification Request for Pedestrian Block Perimeter;
- 7) Modification Request to FWRC 19.120 Standards;
- 8) Response to Public Comments Letter; and
- 9) Revised Preliminary Plat Plan Set.

Process III:

- 1) Comment Response Letter (this letter);
- 2) Revised SEPA Checklist;
- 3) Critical Areas Memo with Mitigation Plans;
- 4) Revised Tree Conservation Plan; and
- 5) Revised Process III/Preliminary Plat Plan Set (including Landscape Plans).

In an effort to provide concise and direct responses, we have copied the review comments below in *italics* and our responses are in **bold**.

COMMUNITY DEVELOPMENT – PLANNING DIVISION - **Becky Chapin**

1. *Preliminary Plat Drawing – Please address the following comments:*
 - *Submittal checklist items per Federal Fray Revised Code (FWRC) 18.35.020:*

- i. *Add the comprehensive plan and zoning classifications of the adjoining properties.*

Comprehensive plan designations and zoning classification are noted for all adjoining properties on sheet PP-02.

- ii. *Include the city file number on subsequent submittals (19-105072-00-SU).*

File #19-105072-SU has been added to all sheets.

- *Lot Area – Per FWRC 19.05.120 "Lot area," the area of a flagpole or access panhandle is not credited in the calculation of minimum lot area. Please provide a net lot area calculation for Lots 11, 18, 21, 57, 58, and 62 that does not include the access panhandle on the preliminary plat map.*

A *Net Area* table has been added to sheet PP-03 that includes the net areas of the flagpole/panhandle lots. The new lot 56 is not considered a flagpole/panhandle lot due to the width and configuration of the access for the lot. The net areas are all at least 5,000 SF.

- *Setbacks – Lots 27-33 show a 20-foot BSBL along the rear property line on Sheet PP-03. The BSBL is 10 feet on the remaining sheets. Please verify setback and revise accordingly.*

All rear setbacks have been updated to be 5' as required by the zoning code.

- *Landscape Buffer– As identified in the preapplication conference summary letter, a 10-foot-wide Type III landscape strip along the arterial street must be provided per FWRC 18.60.030. The landscape strip must be provided in a separate tract, equally owned and maintained by the homeowners; and up to two percent can be credited to open space buffer requirements. Include this tract on the revised preliminary plat map.*

A 10' wide *Landscape Buffer* tract has been added to the preliminary plat map as Tract H.

2. *Clearing and Grading– The submitted preliminary grading plan sheet PP-04 shows a "mass grading" of the entire subject property, with the removal of all the trees within the proposed lots. FWRC 19.120.080 states in part: "Permitted clearing and grading areas should minimize removal of existing trees and minimize the disturbance or compaction of native soils, except as needed for building purposes."*

For mass clearing and grading of the entire site, the applicant will need to provide written justification for modification of clearing grading and tree retention standards pursuant to FWRC 19.120.050. The written request must specifically address each criterion in FWRC 19.120.050(1)(a-d) and (2)(a-c). The modification request must include justification for supporting the request, and at a minimum, identify if there are any areas that can be preserved in existing condition; rational for the clearing request; impacts to trees and vegetation; methods to mitigate visual impacts; etc.

A Request for Modification to FWRC 19.120 Standards letter is provided with this resubmittal to include justification for mass grading of the area of the subject site proposed for single-family residential lots and infrastructure.

3. *Retaining Walls – A separate request for modification for the retaining wall height must be submitted, the summary narrative is not enough to formally request a modification. Per FWRC 19.120.050(2):*
(2) Modification submittal requirements. A request for modification shall:
- a. *Be submitted in the same form and according to the same terms as the required clearing and grading and/or tree and vegetation retention plan documents of this article and subject to the same enforcement requirements;*
 - b. *Be clearly labeled as "Clearing and Grading, and/or Tree and Vegetation Retention Modification Plan"; and*
 - c. *Clearly delineate and identify the deviations requested from the provisions of this article.*

Provide a plan that depicts where the walls will exceed the height and include the actual height of the wall. Also, provide wall details per FWRC 19.120.120(1)(b) and 19.120.120(7). Decision on any modification will occur in conjunction with further review of the proposal, and upon written request by the applicant.

A Request for Modification to FWRC 19.120 Standards letter is provided with this resubmittal to include justification for a taller than 6' wall onsite. Included with the request is an additional exhibit depicting the wall profiles as proposed.

4. *Tacoma Smelter Plume Review – The submitted Arsenic and Lead Soil Assessment prepared by ECI, Environmental Services, identifies several test pits on the site which exceed 20 mg/kg of arsenic in the soils and one sample site that was above the maximum allowed concentration for arsenic. Due to the level exceeding 40 mg/kg, city staff will impose a condition that requires a cleanup plan for the site. The cleanup plan will require Department of Ecology approval.*

A condition with the following effect will be imposed on the project in order to mitigate potential adverse soils and health impacts:

The applicant shall remedy the soils per the Ecology Cleanup Program guidance as a component of the grading permit and then submit a written approval of cleanup (No Further Action) from the Department of Ecology following completion of the grading activities. The No Further Action document shall be submitted to the City of Federal Way Department of Community Development prior to final plat approval.

Noted.

5. *Critical Areas Review – The department's third-party environmental consultant has provided comments regarding the Critical Areas Report, prepared by Sewell Wetland Consulting, Inc. Please see the enclosed memorandum prepared by Jessica Redman with Environmental Science Associates (ESA) for needed corrections.*

ESA's comments are addressed in the revised *Critical Areas Memo and Mitigation Plans* provided by Sewall Wetland Consulting, included with this submittal.

6. *Open Space – The Alteration of Open Space Category Percentages request was reviewed by the Parks Department. Parks Director John Hutton has **denied** the request to alter the open space category percentages to 1.6 percent useable, 25.4 percent conservation, and 0.7 percent buffer. Per FWRC 18.55.060(3), the applicant must provide at least 10 percent minimum of usable open space on-site. The remaining five percent of open space can be conservation, buffer, or constrained.*

An *Open Space Fee-In-Lieu Request* letter is pending, which will include a current land appraisal provided by a state-certified real estate appraiser as required in FWRC 18.55.060(2). The Applicant is attempting to work with the Parks Director on an acceptable fee.

7. *SEPA – City staff is unable to issue a SEPA threshold determination due to several unresolved plat and construction related issues identified in this letter. In addition, the following must be corrected on the checklist:*
- *A. Background Checklist Item #10: A final plat will be required.*
 - *B. Land and Shoreline Use Checklist Item #8a: Elaborate on whether the proposal will affect current land uses on nearby or adjacent properties.*
 - *B. Land and Shoreline Use Checklist Item #8b: The taxes are significantly reduced for the larger 20-acre parcel. Please verify if this property has ever been under forested land tax status, or other conservation protection area.*
 - *B. Land and Shoreline Use Checklist Item #8f: Single Family, High Density.*
 - *B. Land and Shoreline Use Checklist Item #8g: The onsite wetland has a Shoreline Environment Designation of Shoreline Residential.*

The SEPA Checklist has been revised to include suggested updates, clarification and/or revisions from the preliminary plat. Revised text has been bolded in the checklist.

8. *Public Comment Letters – The city has received three public comment letters in response to the Notice of Application. These comments are enclosed for your review and we request that you provide a written response to each of the comment letters as appropriate. If there are comments or concerns in these letters that you deem appropriate to address as project mitigation, please provide comment.*

A *Response to Public Comments* letter is included with this resubmittal.

PUBLIC WORKS – DEVELOPMENT SERVICES - Ann Dower

1. *Easements that are located within future right-of-way dedications must be relinquished. The developer must obtain these relinquishments prior to final plat. They can take time, so it is advisable to start early.*

The applicant is working to obtain easement relinquishments with the easement grantees as required.

2. *Show all easements that are noted in the title report on the plans.*

Notes for all easements from the Title Report have been added to sheet PP-02. Any easement that is able to be mapped is depicted on the sheet.

3. *Include all right-of-way improvements for South 304th Street outlined in the January 24, 2020, Right-of-way Modification decision on the plans and section views.*

Updated right-of-way improvements that were outlined in the ROW Modification decision are included in the revised preliminary plat plan set as shown on sheets PP-06 and PP-07. Street trees are proposed behind the 3' utility strip along 304th to provide additional screening from the ROW.

4. *Show all improvements and dedications required for 20th Avenue South on the plans, and profile views on sheets 6 and 7.*

Cross-section C-C has been revised to include details of improvements for 20th Avenue S from S 304th Street, as shown on sheets PP-06 and PP-07.

5. *All stormwater requirements for the plat also apply to the right-of-way improvements on South 304th Street, 20th Avenue South, and the extension of Road A. Over-detention/over-treatment may be considered if a facility cannot be provided.*

Improvements of the project roads have been included with the proposed stormwater detention and treatment for the project. Please refer to the section 4 of Preliminary TIR for further information.

PUBLIC WORKS – TRAFFIC DIVISION - Sarady Long

1. *Provide non-motorized path from the site to SR 99 to meet the block perimeter standard (Block perimeters shall be no longer than 1,320 feet for non-motorized trips, FWRC 18.55.010 and Federal Way Comprehensive Plan (FWCP) Policy TP4.2). A modification request to modify or waive this requirement may be submitted to the Public Works Director with supporting documentation.*

A *Right-of-Way Modification Request of Pedestrian Block Perimeter* letter is included with this resubmittal.

2. *The new road extension to 20th Avenue South along the northerly Lakehaven Water and Sewer District property (parcel 042104-9169) shall be improved and dedicated to the city prior to plat recording.*

Noted.

3. *The new road extension to 20th Avenue South along the northerly Lakehaven Water and Sewer District property shall be improved to provide a minimum of 24 feet paved, with planter and sidewalk along the north side. This will provide buffer between the new road and the existing resident.*

The new Road A extension to 20th Avenue S along the Lakehaven property has been revised to show planter and sidewalk improvements on the north side as opposed to the south side. Please refer to sheets PP-06 and PP-07, cross-section B-B.

4. *Show the conceptual street lighting plan for the plat.*

Conceptual street lighting has been added to sheet PP-06.

5. *It appears that the east side of 20th Avenue South between South 304th Street and propose Road C may be a private street and has not been dedicate as right-of-way. Show the development has legal access if this is private.*

The east side of 20th Avenue S is dedicated right-of-way. Clarification call-outs have been added to sheets PP-02 and PP-03.

6. *Traffic calming devices should be incorporated in the residential street design to control potential speeding and cut-through traffic.*

Additional traffic-calming devices have been added to the plan as shown on PP-06.

7. *Verify parcel #0421049109 for Lakehaven Water and Sewer depicted on sheet PP-03 is correct. Should this be 0421049168 and -9169?*

The parcel #s on the Lakehaven properties have been updated.

8. *Lot should be designed to ensure that SF driveway meets the AASHTO sight distance.*

Noted. The SF driveway designs will be designed and details during Engineering permit review.

9. *Provide or show safe pedestrian walkway from 20th Avenue South to SR 99. Coordinate with the School District on a safe walking route for students attending Federal Way High School.*

Extruded curb has been added to sheet PP-06 from the project's ROW improvements to the neighboring commercial business driveway. We have been in contact with the school district to confirm their approval, which is pending.

Ms. Becky Chapin
April 1, 2020
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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

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