CITY OF SEQUIM

152 W. Cedar Street, Sequim, WA 98382
PH (360) 683-4139 FAX (360) 681-3448

MEMORANDUM

DATE: July 5, 2019

TO: Barry Berezowsky, Director, DCD

FROM: Matt Klontz, P.E, City Engineer MK

SUBJECT: Legacy Ridge Subdivision, SUB 15-001

Supplemental Preliminary Plat Conditions

Please reference my memorandum to you regarding preliminary plat conditions dated March 21, 2019, with enclosures. The Department of Public Works has reviewed the revised preliminary plat drawings materials dated May of 2019 submitted by the subdivision applicant. The comments and conditions in the above referenced memorandum are still valid.

However, since project (plat) boundaries have changed, I wish to add the following comments:

1. Provide a Stormwater Maintenance agreement that addresses the southwest stormwater facility located on another parcel outside the plat boundaries.
2. Provide a legal instrument that addresses the southwest stormwater facility located on another parcel outside the plat boundaries that demonstrates that the stormwater facility serves Legacy Ridge in perpetuity.

For clarification purposes, I wish to insert the following to Water condition number 1 (ahead of the phrase "Provide a water system…", in the document entitled "SUB15-001 Legacy Ridge Subdivision Public Works Preliminary Plat Conditions:

3. Reference the letter dated June 22, 2018 from Matt Klontz, City of Sequim, to Steve Calhoon of Pace Engineers, and the letter dated February 1, 2019 from Tom Martin of Clallam County PUD to David Garlington of the City of Sequim.

Lastly, I wish to add the following Stormwater condition in the Preliminary Plat Conditions:

4. Offsite stormwater water draining onto the subject development along the south property boundary must be conveyed in a manner to prevent adverse impact to the downgradient properties (Lots 31-39 and 83-97) and upgradient properties south of the subject development. The natural drainage pattern, including but not limited to wetland hydraulic connectivity, must be maintained, and discharge from the project site shall occur at the natural location to the maximum extent practicable to meet Minimum Requirement #4 – Preservation of Natural Drainage Systems and Outfalls required in *WSDOE Stormwater Management Manual for Western Washingto*n, as amended in 2014.

Please feel free to contact me with any questions or concerns.

Incorporated attachments:

- 02_PUD Deficiencies Corrective Action Letter_02012019
- 03_PUD Water Service Deficiencies Letter_06222018
- 04_Memo_Prelminary Plat Conditions_Legacy Ridge December 2018 Resubmittal_03212019
- 05_Preliminary Plat Conditions_03212019
- 06_SUB15-001_Development Review Matrix Final_03212019

CLALLAM COUNTY PUD #1

Bringing Energy To Life™

February 1, 2019

David Garlington
City of Sequim
152 W. Cedar St.
Sequim, WA 98382

Received

FEB - 5 2019

Public Works / DCD

Re: Legacy Ridge 1
Application No. SUB15-001 & SEP15-001

Dear Mr. Garlington,

This letter is in response to the June 22, 2018 letter from Matt Klontz, Sequim City Engineer, to Steve Calhoon, Principal Planner with PACE Engineers, in connection with the above-referenced proposed development. In that letter, Mr. Klontz identified the following three areas of concern with the water service PUD No. 1 of Clallam County (the "District") will provide to the Legacy Ridge 1 subdivision: standby power at the pumping facilities, pump redundancy to ensure satisfaction of the maximum day demand, and 8-inch transmission mains.

Upon receiving Mr. Klontz's letter and the May 1, 2018 Memorandum authored by Nancy Lockett of Gray & Osborne, we engaged Murraysmith, Inc., to address each of the concerns raised by Mr. Klontz and Ms. Lockett. Rather than restate Murraysmith's analysis and conclusions, I have enclosed for your reference a copy of the September 5, 2018 letter I received from Nathan Rostad, a civil engineer with Murraysmith. We ask that you read Mr. Rostad's analysis, conclusion and recommendations, and with that information in mind, please consider the following actions to be taken by the District.

Regarding the City's concern about standby power at the pumping facilities, the District has allocated funds in our 2019 budget for the installation of standby power generators at the Loma Vista and Holgerson well sites, and we intend to begin the design phase within the next month.

Regarding the City's concern about pump redundancy to ensure satisfaction of the maximum day demand, the District has allocated funds in our 2019 budget for the installation of redundant distribution pumping at Booster Pump Station #2. As with the generators described above, we intend to begin the design phase of this additional pump within the next month.

Finally, regarding the City's concern about the District's transmission mains, our 2018 Water System Plan includes a capital improvement project to replace the 4- and 6-inch transmission mains with 8-inch mains. We have not yet determined when that project will commence, but we are committed to having it completed in due course.

Though we are able and willing to make changes to our Evergreen Water System to meet the City's reliability standards, we disagree that we are required to do so. Mr. Klontz states in his letter that the 1995 Intergovernmental Water Service Area Agreement (the "Agreement") between the City of Sequim (the "City") and the District requires that the District's facilities meet the City's standards

potentially be used to satisfy the City's standby power requirements for the facilities that will serve the Legacy Ridge development.

- Complete Capital Improvement Project EV-04 to provide Middle Evergreen Zone transmission mains 8-inch diameter or larger to the proposed development. It is our understanding that the District has performed hydraulic modeling verifying the ability to provide sufficient flow and pressure to the development from the Middle Evergreen Zone after completion of this project. We recommend that the District perform updated hydraulic modeling and work with the Legacy Ridge development engineer to verify the sizing and extent of any required transmission / distribution system improvements once the split of the development between the Lower and Middle Evergreen Zones is known.

In addition to the above recommendations, the Evergreen Tank Siting Study currently underway (2018 District WSP Capital Improvement Project EV-07) should include the proposed development when evaluating the long-term storage requirements beyond the 20-year planning period.

If you have any questions, please contact us at your earliest convenience.

Sincerely,

MURRAYSMITH

Nathan Rostad, PE
Civil Engineer

RKM/mrs

Enclosures: May 1, 2018 memo from Gray & Osborne to the City of Sequim

June 22, 2018 letter from the City of Sequim to Pace Engineers

cc: Marshall Meyer, PE, Murraysmith

J. Brent Gruber, PE, Murraysmith

File

when serving customers within the City limits. The Agreement contains no such requirement. It is possible that Mr. Klontz is reading that obligation into Section 10.1, which provides that facilities constructed within the City limits and the urban growth limits shall be constructed to City standards. That provision, however, applies only to facilities constructed after the date of the Agreement. Additionally, please note that Section 6 specifically excludes from the terms and conditions of the Agreement all existing and future District transmission lines, major distribution feeder lines, and reservoirs.

While we disagree that the City has any basis in requiring that we make changes to our Evergreen Water System to meet the City's reliability criteria in serving the Legacy Ridge development, we have implemented system enhancement plans that will resolve the City's concerns. Our goal is to avoid further delay in the development project. After your review of the enclosed letter from Mr. Rostad, please contact me to discuss next steps.

Thank you.

Sincerely,

PUD NO. 1 OF CLALLAM COUNTY

Tom Martin

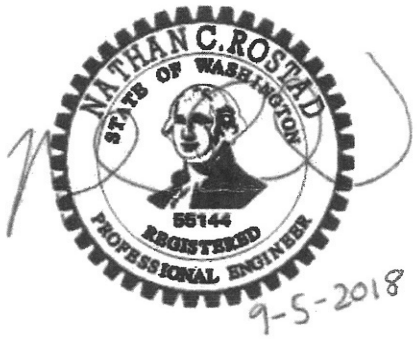
Tom Martin,
Water and Wastewater Systems Superintendent

Encl.
Copy to Matt Klontz, Steve Calhoon

murraysmith

18-2260

Date: September 5, 2018



Mr. Tom Martin, PE
Public Utility District No. 1 of Clallam County
PO Box 1000
Carlsborg, WA 98324

Re: Legacy Ridge Development

Dear Mr. Martin,

The purpose of this letter is to respond to the concerns addressed in the conclusion of the May 1, 2018 memo from Gray & Osborne to the City of Sequim (City), and the letter dated June 22, 2018 from the City to Pace Engineers relative to the Public Utility District No. 1 of Clallam County District's (District's) ability to serve the proposed Legacy Ridge development in the City of Sequim (City). In developing a response to the May 1 memo and June 22 letter, other information reviewed includes the *2014 City of Sequim Water System Plan* (City WSP), the draft *2018 District Comprehensive Water System Plan* (District 2018 WSP), and the *2009 WA DOH Water System Design Manual* (DOH Manual). The District 2018 WSP was prepared consistent with DOH requirements. However, the May 1 Memo and June 22 letter evaluate the District's ability to serve the development based upon more stringent DOH recommended reliability criteria.

It is our understanding that the proposed development involves construction of 97 ERUs within the City and the District's Evergreen Water System Service Area. According to the May 1 memo, the development is proposed on parcels depicted as being located in the Lower Evergreen (500) zone in the District 2018 WSP. Gray and Osborne evaluated the District's ability to serve the proposed development consistent with City water standards and presented the following conclusions in the May 1, 2018 memo:

A. *The PUD WSP indicated the Legacy Ridge development was served from the Lower Evergreen (500) zone. This zone does not have adequate storage or pressure to serve the Legacy Ridge development.*

B. *The Legacy Ridge development could be served from the Middle Evergreen (790) Zone and not disrupt service to the remainder of the 790 Zone. However, the DOH-recommended reliability criteria of providing MDD to the service area with the largest pump out of service could not be met with the addition of the Legacy Ridge development.*

C. *The combined source capacity of the Evergreen Water System is adequate to provide service to the Legacy Ridge development and the existing and planned growth in the system. If the Haller Wells are not available due to water quality concerns, additional source capacity will be required after 2036.*

D. *It is not known whether the Evergreen Water System meets the DOH-recommended reliability criteria for standby power provisions at all major pumping facilities.*

Following the conclusions in the May 1 memo and review of the proposed Legacy Ridge plans, the City's June 22 letter requests that the District's service to the proposed development meet the following standards:

1. *Standby power provisions at all major pumping facilities. Pump stations must have power connections to two independent primary public power sources or have portable or in-place auxiliary power available.*

2. *Multiple pumps should be installed with capacity to provide the maximum day demand (MDD) of the service area when the largest pump is out of service.*

3. *Provide at a minimum, 8-inch transmission mains.*

In response to the May 1 memo conclusions and June 22 comments noted above, we offer the following:

Lower Evergreen (500) Zone Service (May 1 Memo Conclusion A)

The entire development will not be able to be served from the Lower Evergreen Zone based upon the estimated high-water service elevation of 460 feet as indicated in the May 1, 2018 memo. However, the Lower Evergreen (500) zone should be able to provide adequate service pressure of greater than 30 psi to portions of the Legacy Ridge subdivision with water service elevations below approximately 430 feet. Since our review did not include the proposed development plans, we did not assess how many of the 97 proposed ERUs could potentially be served from the Lower Evergreen zone. A review of County lidar elevation data indicates that the existing elevation for approximately 90-percent of the development site lies below 430 feet, indicating the potential to serve a significant portion of the development from the Lower Evergreen Zone. Additionally, a Lower Evergreen Zone transmission main exists along the southern border of the proposed development which could be tapped to serve the development.

→ ISN'T THIS MAIN SUPPLYING WATER TO THE LARGER 2.0 MG BUCY RESERVOIR?

Pumping Capacity (May 1 Memo Conclusion B, June 22 Letter Requirement 2)

As noted above, the May 1 memo indicated that the Middle Evergreen Zone does not have sufficient capacity to provide the maximum day demand (MDD) with one pump out of service if the 97 ERUs from the Legacy Ridge development were added to the projections from the District 2018 WSP, and the City's June 22, 2018 letter indicates that the District's facilities need to provide the MDD with the largest pump out of service to comply with City standards. Water to the Middle Evergreen (790) Zone reservoir (Ravens Ridge Reservoir) is currently provided via BP Station No. 2. This pump station has two identical pumps, having a combined capacity of 255 gpm with both pumps operating in parallel. Each pump has an individual capacity of 160 gpm. Based upon the MDD per ERU used in the District 2018 WSP, BP Station No. 2 has capacity for 309 ERUs, which is 101 ERUs more than existing.

Adding 97 ERUs for the Legacy Ridge development to the projections in the District 2018 WSP as was done in the May 1 Memo is overly conservative due to the fact that the ERUs from this development comprise a portion of the overall 20-year projections for the Lower and Middle Evergreen Zones. It is our understanding that the ERU growth projections presented in the District 2018 WSP were based upon a growth rate selected with the City's input. This growth rate resulted in a total of 160 ERUs being projected to connect to the Lower and Middle Evergreen Zones, indicating that on top of this development an additional 63 ERUs are expected between both zones. For the purposes of this analysis, it was assumed that 33 of these remaining 63 ERUs connect within the Middle Evergreen Zone by 2036.

The ability of the Middle Evergreen Zone to provide the MDD with the largest pump out of service if an additional 97 ERUs connect by 2022 and an additional 33 ERUs connect by 2036 is shown in **Table 1.**

Table 1
Evaluation of Source Adequacy – Middle Evergreen

Projected ERUs and Demand	Year		
	2016	2022	2036
Equivalent Residential Units (ERUs), gpd [1]	208	305	338
Average Day Demand (ADD), gpd	57,200	83,875	92,950
Maximum Day Demand (MDD), gpd	155,012	227,301	251,895
Available Sources – Existing Conditions (With Largest Pump Out of Service)			
BP Station No. 2 (160 gpm), gpd	230,400	230,400	230,400
Haller No. 1 (56 gpm), gpd [2]	-	-	144,000
Haller No. 2 (101 gpm), gpd [2]	-	-	
Total Available Source, gpd	230,400	230,400	374,400
MDD Source Surplus/(deficiency), gpd	**75,388**	**3,099**	**122,506**

1 Demand forecast includes total growth from existing of 97 ERUs by 2022 and 130 ERUs by 2036.
2 Haller Wells are currently backup sources. Capacity of 100 gpm assumed online by 2036.

With an additional 97 ERUs from the proposed development on top of the existing ERUs in the District 2018 WSP, the projected 2022 MDD would still be able to be provided by District's existing system with the largest pump out of service. This assumed ERU growth by 2022 may still be conservative given the ability of a portion of the development to be served by the Lower Evergreen Zone. The long term source adequacy of the Middle Evergreen Zone with a pump at BP Station No. 2 out of service will be largely dependent upon the final configuration of the proposed development, growth in other areas of the zone, and the timing of the Haller Wells being converted from backup to production. If necessary, one method of increasing the capacity of BP Station No. 2 with one pump out of service would be to add a third identical 160 gpm pump, which would result in the pump station having a capacity of 255 gpm with the largest pump out of service.

Standby Power Provisions (May 1 Memo Conclusion D, June 22 Letter Requirement 1)

It is our understanding that the District does not currently have standby generators at any of its Evergreen Water System pumping facilities. According to Section 7.7 in the *DOH Manual,* DOH highly recommends on-site backup power or gravity standby storage unless the following power grid reliability criteria is met:

1. *Outages average three or less per year based on data for the three previous years with no more than 6 outages in a single year. Power loss for at least 30 minutes usually qualifies as an outage.*

2. *Outage duration averages less than four hours based on data for the three previous years, with no more than one outage during the three previous year period exceeding eight hours.*

Data from the District's Electric Department for the Evergreen Water System during the period of 2015-2017 is summarized here:

- The number of power outages averaged two per year.
- The highest number of outages in a year was three in 2016.
- The average duration of power outages was 3 hours, 59 minutes.
- Only one power outage exceeded 8 hours in the three-year period.

This data shows that the Evergreen Water System power grid is reliable and does not trigger the DOH recommendation for standby power. Although adding backup power is not required by DOH guidelines, the City's June 22 letter and Chapter 3 in the *City WSP* indicates that standby power provisions are required at all major pumping facilities. In order to provide standby power to all facilities that would serve the Legacy Ridge development, standby power provisions will be needed for BP Station No. 1, BP Station No. 2, and the Loma Vista wells. It is also possible that the District could use backup power installed at the Holgerson Well to serve the Middle Evergreen Zone, via PRVs, in the event of a power outage.

Transmission Main Minimum Diameter (June 22 Letter Requirement 3)

The City has requested that the development be served with transmission mains that are 8-inch diameter or larger. Currently, a portion of the District's water system between the Middle Evergreen Reservoir and the proposed development site consists of 6-inch and 4-inch diameter pipe. The District's 2018 WSP includes Capital Improvement Project EV-04, which will replace 1,450 linear feet of 6-inch diameter and 4-inch diameter pipe with 8-inch pipe along 7th Avenue, providing transmission mains 8-inch diameter or larger between the Middle Evergreen Reservoir and the proposed development site. Lower Evergreen Zone transmission mains of 8-inch diameter and larger between the Lower Evergreen Reservoir and the proposed development site already exist. Upon completion of Capital Improvement Project EV-04, the district will meet the City's request of providing 8-inch diameter or larger transmission mains for the proposed development.

Haller Wells Water Quality (May 1 Memo Conclusion C)

It is our understanding that the District intends to convert the Haller Wells located in the Middle Evergreen (790) zone from backup to production status in the future. As discussed in section 8.4.2 of the 2018 District *WSP,* Capital Improvement Project EV-03 will eliminate the iron and manganese water quality concerns.

Conclusion and Recommendations

This letter addressed the City's concerns regarding the storage requirements in the Lower Evergreen (500) Zone, the demand requirements in the Middle Evergreen (790) Zone, standby power requirements, transmission main sizing, and water quality at the Haller Wells in response to Gray & Osborne's memo dated May 1, 2018 and City's letter dated June 22, 2018. In order to provide service to the proposed Legacy Ridge development while meeting the City's reliability requirements, we recommend the following:

- Closely monitor growth and demand within the Middle Evergreen Zone relative to the ability of BP Station No. 2 to supply the zone with one pump out of service. If necessary, install an additional pump at BP Station No. 2 to accommodate demand from future development. The actual timing of the need for the additional pump, if any, will be based upon the ERU split between zones to be determined once development plans are final, other growth within the Zone, and the timing of converting the Haller Wells from backup to production.

- Install portable or permanent standby power provisions for BP Station No. 1, BP Station No. 2, and Loma Vista Wells. It is our understanding that the District has budgeted for purchase of a trailer mounted standby generator and plans to install backup power provisions at all well sites. We recommend that any standby generator for the Loma Vista site be sized to power BP Station No. 1 in addition to the well pumps. Backup power installed at the Holgerson Well would result in additional source capacity available to the Middle Evergreen Zone, via PRVs, that could supply the zone in the event of a power outage. The District should discuss with the City how this portable generator could

CITY OF SEQUIM

152 W. Cedar Street, Sequim, WA 98382
PH (360) 683-4139 FAX (360) 681-3448

June 22, 2018

Steve Calhoon, ASLA/RLA
Principal Planner
PACE Engineers, Inc.
11255 Kirkland Way (STE 300)
Kirkland, WA 98033-6715

SUBJECT: **Clallam County PUD No. 1 Water Service** for:
Legacy Ridge 1
Application No,: (SUB15-001 & SEP15-001)

Dear Mr. Calhoon,

This letter is in regard to water service for the proposed Legacy Ridge 1 subdivision. Clallam County PUD No. 1 (PUD) informed the City of Sequim (City) that it desires to own and operate the transmission water mains serving the Legacy Ridge development rather than enter into a wholesale agreement with the City. Additionally, PUD provided a letter stating they had adequate water storage and pressure to meet the City's service standards and would serve the subdivision in perpetuity.

To enable this arrangement, the *Intergovernmental Water Service Area Agreement* between the City and PUD requires that PUD's facilities meet City's standards when serving customers inside the City limits. Consequently, the City evaluated PUD's water system to confirm adequate public facilities meeting the City's standards would be provided. The City's 2014 adopted Water System Plan (WSP) establishes minimum standards based on the International Fire Code, American Water Works Association best practices, and the Washington State Department of Health (DOH) recommended reliability criteria for municipal water systems.

Upon evaluation of PUD's 2017 WSP, it was determined that DOH's reliability criteria was not considered in PUD's WSP and consequently there are several deficiencies PACE Engineers and PUD must address as part of the subdivision approval in accordance with Sequim Municipal Code 17.20.040.

These deficiencies include:

- Standby power provisions at all major pumping facilities. Pump stations must have power to connections to two independent primary public power sources or have portable or in-place auxiliary power available.
- Multiple pumps should be installed with capacity to provide the maximum day demand (MDD) of the service area when the largest pump is out of service.
- Provide at a minimum, 8-inch transmission mains.

The City is committed to continuing to work with PACE Engineers on this subdivision application. However, the responsibility to resolve the above deficiencies is the responsibility of subdivider.

Sincerely,

Matt Klontz, P.E.
Sequim City Engineer

CITY OF SEQUIM

152 W. Cedar Street, Sequim, WA 98382
PH (360) 683-4139 FAX (360) 681-3448

MEMORANDUM

DATE: March 21, 2019

TO: Barry Berezowsky, Director, DCD

FROM: Matt Klontz, P.E., City Engineer MK

SUBJECT: Legacy Ridge Subdivision, SUB 15-001

Preliminary Plat and Subdivision Review

The Department of Public Works has reviewed the materials submitted by the subdivision applicant on December 27, 2018. Public Works recommends the approval of the preliminary plat and subdivision application with inclusion of the enclosed plat conditions. If you have any questions regarding the enclosed information, please do not hesitate to contact me.

Enclosure: Public Works' Preliminary Plat Conditions, Comment Matrix Log

SUB15-001

LEGACY RIDGE SUBDIVISION

Public Works' Preliminary Plat Conditions

Water

1) Provide a water system to serve the subdivision in accordance with City of Sequim design standards for materials, sizing, pressure, reliability, redundancy, fire and life safety. Submit drawings for approval prior to construction showing location of all facilities and lines. If water is to be supplied by Clallam County PUD then the following conditions (2 through 4) must be met:
2) Prior to Final Plat approval, install, test and commission standby generators of adequate size and operating capacity at Clallam County PUD Booster Pump Station Number 1, Booster Pump Station Number 2 and Loma Vista Wells sites. (PW Comment 53)
3) Prior to Final Plat approval, install, test and commission multiple (redundant) pumping capability at Booster Pump Station Number 2, to supply the maximum day demand of the service area when the largest pump is out of service. (PW Comment 53)
4) Prior to Final Plat approval, replace existing 6-inch and 4-inch transmission mains serving Legacy Ridge with 8-inch diameter mains meeting City of Sequim Development Standards. (PW Comment 53)
5) Dedicate and record a water main easement, 15 feet minimum, to Clallam County Public Utility District for the water main distribution system. (PW Comment 50)
6) Provide ductile iron resilient seated gate valves, spaced no more than 1000 feet or midblock; three valves at tees, four valves at crosses and on six-inch service lines to hydrants (PW Comment 46)
7) Provide air-vacuum assemblies at all isolated high points in the system. (PW Comment 47)
8) Provide blow off assemblies at all isolated low points in the system and at dead ends. (PW Comment 48)
9) Provide a minimum of 3'-6" cover over all eight-inch or less sized water mains except 4'-0" in easements. (PW Comment 49)
10) In addition to AWWA acceptance testing, developer to perform hydrant testing following construction of water distribution system to demonstrate available fire flow (1000 gpm, 1 hr, with 20 psi minimum at services with operation, equalizing, and fire suppression storage volumes depleted) during maximum day demand. (PW Comment 52)
11) Utility castings shall be located outside of bike lanes. (PW Comment 56)

Stormwater

12) Reference Sheet C2.0 of the Preliminary Plat Drawings. Prior to Final Plat approval, the emergency overflow SDMH #4, Catch Basin #2 and #3 in Tract A shall be directed to the existing drainage way on the east side of South 7th Avenue. The existing drainage way shall be regraded to ensure flow to the north. As shown, the overflow is discharging into an

infiltration system serving Comfort Way that is not hydraulically connected to a ditch or piped conveyance system flowing to the West.

13) Reference Sheet C2.1 of the Preliminary Plat Drawings. Prior to Final Plat application submission, submit legal documentation giving permission to connect overflow piping from Catch Basin #10 to the adjacent property to the north adjacent to the southwest stormwater detention facility located in Tract O. Submit engineering calculations verifying the adequacy of the receiving facility located on adjacent property to accommodate the overflow from the southwest stormwater detention facility.
14) Provide information (design) regarding orifice sizing in the control structure, overflow structure, and emergency overflow. (PW Comment 13 & 14)
15) The maximum area in square feet of hard surface allowed and any installed BMP's shall be recorded on the Final Plat for each residential lot. (PW Comment 24)
16) Prior to Final Plat approval, a stormwater management agreement demonstrating the maintenance obligations of the Homeowners Association shall be submitted to the City for review and approval. (PW Comment 4)
17) Provide internal and external wall stability calculations for the cut wall in the detention/wet pond. (PW Comment 19)
18) The aesthetics of the north facing ecology block wall does not fit the neighborhood context. Provide a context sensitive design that results in a pond that is natural in appearance. (PW Comment 20)
19) Provide profile and invert information for SDMH #13 to #17. Provide detail for steep slope restraint of the above ground pipe. (PW Comment 22)
20) Stormwater management shall meet the requirements of SMC 13.108. A Stormwater site plan must be submitted with the Site Construction Permit application(s). (General Condition)
21) All site construction shall be conducted in compliance with the 2012 WSDOE Stormwater Management Manual for Western Washington, as amended in 2014. (General Condition)
22) A Certified Erosion and Sediment Control Lead (CESCL) must be provided by the applicant for project oversight during all land disturbing activities, per the 2012 WSDOE Stormwater Management Manual for Western Washington, as amended in 2014, Best Management Practice (BMP) C160. (General Condition)
23) Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the State. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants. Any discharge of sediment-laden run off or other pollutants to waters of the State is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface waters of the State of Washington and is subject to enforcement action.

The following construction activities require coverage under the Construction Stormwater General Permit

a. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and
b. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State. This includes forest practices (including, but not limited to, Class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and
c. Any size construction activity discharging stormwater to waters of the State that Ecology:
1. Determines to be a significant contributor of pollutants to waters of the State of Washington,
2. Reasonably expects to cause a violation of any water quality standard.

If contamination is suspected, discovered, or occurs during the proposed SEPA action, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator for the Southwest Regional Office (SWRO) at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, Contact Matthew Morris with the SWRO, Toxics Cleanup Program at (360) 407-7529.

If there are know soil/ground water contaminants present on site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/ - Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of first public notice. (General Condition)

Streets

24) Prior to Final Plat approval, easements and maintenance agreements for shared driveways shall be provided and recorded. (PW Comment 37)
25) At such time the westerly property seeks to develop, efforts shall be made to evaluate the feasibility of establishing an east-west roadway connection to Roadway D of Legacy Ridge. (DCD Comment 6c)
26) Provide horizontal stopping sight distance calculation for S 7th Ave for a 25 MPH posted/design peed per WSDOT or AASHTO design manual criteria. (PW Comment 30)
27) Sight distances at intersections shall be as required by AASHTO T 9-6. (PW Comment 32)

28) Provide pavement section design recommendation. (PW Comment 16)
29) All lots located along 7th Avenue shall have shared driveway access. Provide easement dedication and maintenance agreement. (PW Comment 37)
30) Provide a signing and striping (channelization) plan. (PW Comment 43)
31) Pedestrian scale lighting using the City of Sequim standard luminaire is required for local roads and South 7th Avenue. (PW Comment 44)
32) Cast iron detectable warning plates must be installed at all ADA curb ramps.

General Public Works Conditions

33) City approval of detailed construction plans for the project and all public infrastructure is required for a Site/Right-of-Way Construction Permit. Plans must be signed and sealed by a professional registered engineer licensed in the State of Washington. All improvements must meet or exceed the City of Sequim Development codes, ordinances and standards. (General Condition)
34) Construction hours and conditions shall be approved by the Public Works Department as a condition of Site Construction Permit issuance. (General Condition)
35) The City or its Agent including but not limited to an independent inspector and/or a material tester shall have full access to the site during construction for the purpose of inspecting and testing to verify conformance to the approved Site Construction Plans, Specifications (current version of the WSDOT Standard Specifications), and City Standards. Inspections will be ongoing through the duration of the project. Testing frequencies will be at a minimum the frequency included in the Specifications. (General Condition)
36) All materials to be permanently incorporated into the project components that are to be dedicated to the City require approval by the City. (General Condition)
37) Upon completion of construction and prior to acceptance, the approved construction drawings shall be corrected to reflect “As-Built” conditions by the Engineer of Record and shall be returned to the City. The record drawing submittal shall include a .pdf file on electronic media and the required signatures. For drawings created in electronic form, the submittal shall also include an AutoCAD file version 14.0 or higher of the “As-Built” drawings on electronic media. The file shall be in Washington State Plane (North Zone) coordinate system, NAD 83 datum, NAVD 88, in U.S, feet. (General Condition)
38) Follow the requirements of the City of Sequim’s Inadvertent Discovery Plan (IDP).
39) Transportation and Parks Impact fees and Sewer and Water General Facilities Charges (GFC) will be collected at the time of building permit issuance for each lot. The applicant may be eligible to receive a credit for Transportation Impact Fees in accordance with SMC 22.04.050 for the construction of South 7th Avenue and associated infrastructure including but not limited to street improvements, curb and gutter, landscaping, sidewalk, stormwater facilities, and pedestrian scale lighting. (General Condition)
40) Street lighting design shall be submitted to the City of Sequim Planning and Public Works Departments and shall be in conformance with examples identified in the City of Sequim Streetscape Manual. Street lighting shall include: Dark-sky compliant, 12’ Nevada style pedestrian scale lights consistent with the City of Sequim standard street light are required along frontage improvements to 7th Avenue and internal streets serving the development.
41) All plans submitted for final approval shall be titled:

CITY OF SEQUIM, MAJOR PRELIMINARY SUBDIVISION (SUB 15-001)

FOR:

Legacy Ridge

IN SECTION 30, TOWNSHIP 30 NORTH, RANGE 3 WEST, W.M.

CITY OF SEQUIM, CLALLAM COUNTY

DCD Comments

42) Provide a letter of approval from Highland Irrigation District in support of the design and easements shown on the Preliminary Plat (DCD Comment 24)
43) A Boundary Line Adjustment (BLA) will be required prior to or concurrent with the Preliminary Plat. (DCD Comment 5)
44) Provide landscaping plans for mitigation areas consistent with Section 9 of the Critical Areas Report. (Comment 2, Section C, Comment June 2018)
45) Full infrastructure must be built to all phase lines. (DCD Comment 6a)
46) Root Guards are required for street trees planted in the public right-of-way or adjacent sidewalk.

Rec'd by City of Sequim
DCD/Public Works
12/28/18

Legacy Ridge

Review Comments with Responses
Milestone: 2016 Preliminary Plat
Reviewed By: Sequim PW & Agency's Consultant
Resolution Code Legend
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Comment No.	Doc.	Page	Section	Reviewer	2016 City Comment	Applicant Response January 2018	Status	City Follow-up Comment June 2018	Applicant Response December 2018	Status 2	Preliminary Plat Condition
1	Drain. Report	6	MR4		The site has been divided into sub-basins 1 and 2. Wetland N, Tract H, is included in sub-basin 1 and the flow from this area is assumed to be routed to the north treatment/detention facility. Per the Critical Area Study & Buffer Mitigation Plan Wetland, Wetland N discharges to Stream H (Tract P). Wetland N receives flow from off-site as well as local runoff. It is not clear how the hydro period of Wetland N will be protected, the impact on Stream H due to the reduction of flow from Wetland N and how excess flow from Wetland N will be directed to the north treatment/detention facility. Please clarify.	**Upon re-evaluation, flow pattern of Wetland N to Stream H has been maintained. Subbasin delineations have been revised.**	A			A	
2	Drain. Report	7	MR5		The 2014 Ecology Manual requires the use of on-site Stormwater Management BMPs to the maximum extent feasible without causing flooding or erosion impacts. The Drainage Plan assumes all roof runoff will be connection to the piped conveyance system and that perforated stub-outs, an on-site management techniques, will not be used due to poor hydrologically conductive soil. Per the 2014 Ecology Manual, BMP T5.10C, Perforated Stub-out Connections, may be used only when all other higher priority on-site Stormwater management BMP's are not feasible. In addition, the only limitation to the use of perforated stub-out connections listed in the 2014 Ecology Manual is when seasonal water table is less than one foot below the trench bottom. The proponent should explore all possible means of providing on-site Stormwater management BMP's and, at a minimum, should provide perforated stub-out connections for roof drainage.	**Lots 32-97 shall have perforated roof drain stub and connections to the tightlined storm system, as noted on Sheet C1.2 of the revised plan set. Lots 1 - 31 shall have tightlined roof drain lines so as not to introduce additional water to soils above slope to west.**	A			A	
3	Drain. Report	7	MR7		The Drainage Plan states that pre-developed conditions are modeled as forested. The hydraulic model and tables describing the pre-development conditions in Section 4 of the Drainage Plan should be revised with the assumption that all off-site predeveloped conditions are forested rather than pasture and impervious.	**This comment is confusing. Offsite conditions are not part of the project limits or proposed development. Offsite properties are outside of the applicant's control and are modeled as current conditions for flow through as they should be. The applicant is not responsible for providing detention for previous development to properties outside the project area on property outside the applicant's control. This would be the responsibility of that other property owner if/when they choose to apply for permit to develop.**	A			A	
4	Drain. Report	8	MR9		Identify the party who will be responsible for maintenance of the Stormwater facilities in perpetuity.	**Will be the responsibility of HOA.**	A			A	Condition the preliminary plat
5	Drain. Report	25	Section 4		A. Hydraulic Analysis. Pre-developed conditions for all areas should be modeled as forested. See comment 3.	**This comment is confusing. Offsite conditions are not part of the project limits or proposed development. Offsite properties are outside of the applicant's control and are modeled as current conditions for flow through as they should be. The applicant is not responsible for providing detention for previous development to properties outside the project area on property outside the applicant's control. This would be the responsibility of that other property owner if/when they choose to apply for permit to develop.**	A			A	
6	Drain. Report	25	Section 4		Table I. Off-site area total should be 213,150 sf not 450,423 sf.	**Numbers have been revised.**	A			A	
7	Drain. Report	29	Section 4		B. Flow Control Calculations, Sub-basin 1. Pre-developed conditions for all areas should be modeled as forested. See comment 3.	**This comment is confusing. Offsite conditions are not part of the project limits or proposed development. Offsite properties are outside of the applicant's control and are modeled as current conditions for flow through as they should be. The applicant is not responsible for providing detention for previous development to properties outside the project area on property outside the applicant's control. This would be the responsibility of that other property owner if/when they choose to apply for permit to develop.**	A			A	
8	Drain. Report	30	Section 4		Correct description of the total storage volume of the pond to meet the information provided on plan sheet C2.6.	**Numbers have been revised.**	A			A	
9	Drain. Report	30	Section 4		Provide detail in the report regarding control structure, overflow structure and emergency overflow.	**Details provided in revised report and revised plans. Further detail to be provided in Final Plat construction documents.**	A	To be addressed in the site construction drawings. Provide and emergency overflow spillway per Volume III, Section 3.2 of the 2014 Ecology Manual for each of the ponds. The emergency overflow spillway may be an emergency overflow structure only if the pond berms are less than 2 feet in height		A	

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10	Drain. Report	31	Section 4		Sub-basin 2: Pre-developed conditions for all areas should be modeled as forested. See comment 3.	**This comment is confusing. Offsite conditions are not part of the project limits or proposed development. Offsite properties are outside of the applicant's control and are modeled as current conditions for flow through as they should be. The applicant is not responsible for providing detention for previous development to properties outside the project area on property outside the applicant's control. This would be the responsibility of that other property owner if/when they choose to apply for permit to develop.**	A			A	
11	Drain. Report	32	Section 4		Provide information in the report regarding estimated infiltration rate, the proximity of groundwater, the depth of fill proposed, overflow structure, etc.	**Please see AESI Subsurface Exploration and Groundwater Mounding Assessment dated August 15, 2017.**	A	See comment 15		A	
12	Drain. Report	33	Water Quality Calculations		Table 5. The model data provided indicate the required on-line facility volume for Sub-basin 2 is 1.274 ac-ft. Table 5 indicates the volume required is 1.2271 ac-ft. Plan sheet C2.6 indicates 53,452 cf (1.2271 ac-ft.) is required. Reconcile with model data.	**Numbers have been revised.**	A			A	
13	Drain. Report	34	Water Quality Calculations		Sub-basin 1 Combined Detention & Wet Pond detail. Provide information regarding the orifice sizing in the control structure, overflow structure and emergency overflow.	**Details provided in revised report and revised plans. Further detail to be provided in Final Plat construction documents.**	A	To be addressed in the site construction drawings.		A	Condition the preliminary plat
14	Drain. Report	35	Water Quality Calculations		Sub-basin 2 Pond System detail. Provide information regarding pond overflow structure and emergency overflow (treatment and infiltration ponds).	**Details provided in revised report and revised plans. Further detail to be provided in Final Plat construction documents.**	A	To be addressed in the site construction drawings. Provide and emergency overflow spillway per Volume III, Section 3.2 of the 2014 Ecology Manual for each of the ponds. The emergency overflow spillway may be an emergency overflow structure only if the pond berms are less than 2 feet in height		A	Condition the preliminary plat
15	Geotechnical Report				The Pilot Infiltration Testing Results and Recommendations for Soil Infiltration Rates Related to Stormwater Management for the Legacy Ridge Plat Development Project Located in Sequim, Washington indicated seasonal groundwater is within 3 feet of the ground surface. 2014 Ecology Manual, SSC-6 Depth to Bedrock, Water Table, or Impermeable Layer (Volume III, page 3-79) states that the base of all infiltration basins shall be ≥5 feet above the seasonal high-water mark. A separation down to 3 feet may be considered if the ground water mounding analysis, volumetric receptor capacity, and the design of the overflow and/or bypass structures are judged by the site professional to be adequate to prevent overtopping and meet the site suitability criteria. The Pilot Infiltration Testing report recommended a mounding analysis given the presence of residential properties down-gradient of the pond site and the shallow seasonal water table. The mounding analysis should be conducted.	**Please see AESI Subsurface Exploration and Groundwater Mounding Assessment dated August 15, 2017.**	A	The Subsurface Exploration and Ground Water Mounding Assessment Legacy Ridge, September 7, 2017, adequately addresses groundwater mounding. According to the report, the maximum groundwater elevation due to mounding during peak inflow rate or peak volume rate "should not impair infiltration from the pond function, even during periods of peak stormwater inflows." In addition, the report states that "ground water mounding at the west property line, near neighboring septic drainfields, was less than one foot for both the peak stormwater volume and the maximum volume scenarios, and is not interpreted to have a significant adverse impact on septic drainfield performance." Per the 2014 Ecology Manual, Volume III, Section 3.3.7, SSC-5, the base of all infiltration basins shall be equal to or greater than 5 feet above the seasonal high-water mark; however a separation down to 3 feet may be considered if the groundwater mounding analysis, overflow, and/or bypass structures are judged to be adequate to prevent overtopping. The distance to groundwater is less than 5 feet and the groundwater monitoring analysis indicates the modeled groundwater mounding should not impair infiltration function. An emergency overflow spillway in conformance with BMP C209 should be provided in addition to the overflow structure to prevent damage to the embankment in case of an overflow event.		A	
16	Geotechnical Report				Provide pavement section design recommendation.	**Further detail to be provided in Final Plat construction documents.**	A	To be addressed in the site construction drawings.		A	

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17	Plans	C2.0 C2.2	Drainage		Provide detailed design plan and profile for detention/wet pond and wet pond and infiltration basin per the 2014 Ecology Manual, Volume III, Section 3.2.1 that addresses the following: a. Retaining walls such as rockeries, concrete, masonry unit walls, and keystone type wall may be used in detention ponds if the wall is designed by a geotechnical engineer or a civil engineer with structural expertise. Provide stamped plans and structural calculations for the walls proposed in the north detention pond. b. Pond berm embankments should be constructed on native consolidated soil or adequately compacted and stable fill soils analyzes by a geotechnical engineer. c. Pond berm embankments greater than 4 feet must be constructed by excavating a key equal to 50 percent of the berm embankment cross-sectional height and width. d. Berm embankment soils must have the following characteristics: a minimum of 20% silt and clay, a maximum of 60% sand, a maximum of 60% silt, with nominal gravel and cobble content. e. An emergency overflow spillway armored with riprap in conformance with BMP C209: Outlet Protection (Volume II) is required in addition to a primary overflow. . f. Provide access roads to the control structure and other drainage structures associated with the pond. Access must be provided for removal of sediment must be provided to the bottom of the pond if the pond is greater than 1,500 square feet. g. Fencing must be provided if the interior side slope is steeper than 3H:1 V or where the impoundment is a wall greater than 24 inches in height.	**a. Further detail to be provided in Final Plat construction documents.** **b. Further detail to be provided in Final Plat construction documents.** **c. Further detail to be provided in Final Plat construction documents.** **d. Further detail to be provided in Final Plat construction documents** **e. Overflow routing is accomplished via secondary manhole and piping system.** **f. Pond access has been provided in revised plan set.** **g. Fencing called out in upper pond detail on sheet C2.7.**	A	To be addressed in the site construction drawings.		A	
18	Plans	C2.0	Drainage		Provide size and invert information about the pipe shown in the 20' easement from Tract D to Tract C.	**This pipe removed in the revised plan set**	A			A	
19	Plans	C2.0	Drainage		Provide internal and external wall stability calculations for the rock cut wall in the detention/wet pond	**Further detail to be provided in Final Plat construction documents**	B	Wall stability analysis to be addressed as part of the site construction permit phase. Wall type callout to be removed from Preliminary Plat plans.	**Wall stability analysis to be addressed as part of the site construction permit phase. Wall type callouts have been removed from Preliminary Plat plans.**	A	Condition the preliminary plat
20	Plans	C2.0	Drainage		The aesthetics of the north facing ecology block wall does not fit the neighborhood context. Provide a context sensitive design that results in a pond that is natural in appearance.	**Further detail to be provided in Final Plat construction documents**	A	To be addressed in the site construction drawings.		A	Condition the preliminary plat
21	Plans	C2.0	Drainage		Locate the Stormwater conveyance pipe for the detention/wet pond outlet in the 7th Ave roadway prism (offset 17' right from center line) and not the ditch as 7th Ave will be widened in the future to include a 11' lane, 6' bike lane, curb & gutter, and sidewalk.	**Pond outlet revised to better match existing drainage patterns.**	B	Reference Sheet C2.0. The outlet from the north detention pond has been revised to discharge to the private storm sewer in Comfort Way. Provide location and invert elevations of inlets and outlets of the new catch basin. An easement for work on the private road will be required.	**Data for existing catch basins in Comfort Way is now provided on the plans showing the connection point of the proposed storm system. Also, attached as part of the resubmittal package is a copy of an August 12, 2004 recorded Declararation of Easements from Errol Cowan granting utility extensions/easement to the Boyd property as part of development of the Greentrust Short Plat.**	A	Condition the preliminary plat. Provided documentation does not satisfy this requirement. Add condition to preliminary plat approval.
22	Plans	C2.3-C2.5	Drainage		Provide profile and invert information for SDMH #17 to #13. Provide detail for steep slope restraint of the above ground pipe	**Overland storm pipe profile and proposed pipe anchor system shown in revised plan set. See sheet C2.6.**	A			A	Condition the preliminary plat
23	Stormwater	General			Maintenance and ownership of the Stormwater facilities will be the responsibility of the development. Provide the City for review the Stormwater maintenance agreement as part of the preliminary plat.	**A Draft Stormwater Maintenance Agreement is provided with the resubmittal.**	A	A final version of the maintenance agreement for stormwater facilities will need to be reviewed and agreed-upon by the City prior to Final Plat Approval.		A	
24	Stormwater	General			For each lot the maximum square footage of hard surface and any onsite BMP's shall be recorded in the deed.	**Further detail to be provided in Final Plat construction documents**	A	City to review Final Plat for conformance.		A	Condition the preliminary plat
25	Plans	C1.2	Road		The section for S 7th Ave (Typical Sections B, C, D, E) shall be 6' sidewalk on both sides, 4' planter on both side, vertical curb & gutter on both sides, 6' bike lanes on both sides, 11' travel lanes on both sides. An additional 7' for parking is optional. Widths are measured from the front face of vertical curb.	**Road cross-sections have been revised in plan set.**	A			A	
26	Plans	C1.2	Road		The section for local roads (Typical Section A) shall be 6' sidewalks on both sides, 4' planter on both sides, vertical curb and gutter, and 10' shared lanes. An additional 7' for parking is optional. Widths are measured from the front face of vertical curb.	**Road cross-sections have been revised in plan set.**	A			A	

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27	Plans	C1.2	Road		The 6' sidewalks for S 7th Ave shall extend the full length of the development between approx. Sta 81+10 and the Comfort Way intersection.	**Road and sidewalk limits have been updated in revised plan set.**	B	1) Extend sidewalk on east side S. 7th up to the Comfort Way intersection to provide ADA east-west curb ramps at the intersection and eliminate mid-block curb ramps at station 96+10. 2) Extend sidewalk on eastside S. 7th from station 82+90 to the Road A intersection and provide east-west curb ramps. 3) Extend sidewalk on Westside S. 7th from Road A to south parcel boundary at approximately station 81+10.	**1) Sidewalk on east side of S 7th Ave has been extended up to the Comfort Way intersection and provides for an ADA east-west curb ramp crossing at approximately Sta 96+65 eliminating a mid-block crossing location.** **2) Full sidewalk improvements have been extended along the eastside of S 7th Ave from north to south to the Road A intersection with east-west curb ramps at approximately Sta 82+83.** **3) Full sidewalk improvements have been extended along the westside of S 7th from Road A to the south parcel boundary at approximately Sta 81+10.**	A	
28	Plans	C1.2	Road		Provide vertical curb and gutter, 4' planter and 6' sidewalk along the east (right) edge of S. 7th Ave.	**Road and sidewalk limits have been updated in revised plan set.**	A			A	
29	Plans	C1.2	Road		Provide roadway geometric data for S 7th Ave. The horizontal and vertical alignment shall meet or exceed WSDOT or AASHTO design manuals criteria for a 25 MPH posted/design speed.	**Plan set now shows horizontal data as well as vertical data. Maximum slope meets requirements given to applicant on project initiation. Follows City concept drawings for S. 7th Ave. See attached drawings given to applicant by City, on January 30, 2014, for use as expected improvements template.**	A			A	
30	Plans	C1.2	Road		Provide horizontal stopping sight distance calculations for S 7th Ave for a 25 MPH posted/design speed per WSDOT or AASHTO design manual criteria..	**Plan set has been revised to include sight distance data.**	B	Plan calculations do not demonstrate that a clear line of sight is provided. Please graphically demonstrate that the street trees are not a sight obstruction. See WSDOT DM 1260.03(5).	**Sight distance triangles have been graphically shown at intersections entering S 7th Ave on sheet C1.4. Matrix showing distances is also included on this sheet.**	B	280' sight distance required by AASHTO T 9-6, Road B Southbound addressable by adjusting decision point. For Road A it appears the lot boundary for 68 and 69 will need to be modified (i.e. increase the track F area to accommodate sight triangle) as well as removal of additional trees shown in the west planter strip will be necessary.
31	Plans	C1.2	Road		Provide vertical sight distance calculations for S 7th Ave for a 25 MPH posted/design speed per WSDOT or AASHTO design manual criterial	**Plan set has been revised to include sight distance data.**	A			A	
32	Plans	C1.2	Road		Provide intersection sight distance calculations for S 7th Ave.	**Plan set has been revised to include sight distance data.**	B	Street and park trees will result in an intersection sight-distance obstruction looking North.	**Sight distance triangles have been graphically shown at intersections entering S 7th Ave on sheet C1.4. As shown, proposed tree locations do not cause obstructed sight distance. Line of sight distances have been calculated using the street curbline as the maximum extent of sight line variance except for across Tract F from which proposed trees have been removed. Under developed conditions branches that may come to obstruct a pedestrian access route or vehicle visibility shall be pruned to comply with agency regulations.**	A	Note, check construction permit drawings
33	Plans	C1.2	Road		Provide alignment and profile for future extension of roads A, C, and D to demonstrate feasibility.	**Plan set has been revised to show road extension feasibilities.**	A			A	
34	Plans	C1.3	Road		Roads D & C should be extended to the development boundary.	**Revised plan set shows roads extended to project boundary.**	A			A	
35	Plans	C1.2	Road		Extend road D and A to the boundary of the development.	**Revised plan set shows roads extended to project boundary.**	A			A	
36	Plans	C2.5	Road		The maximum allowable roadway profile grade for S 7th Ave is 11 to 12 percent for rolling terrain in urban environments per WSDOT Design Manual 1220.02(6).	**Maximum slope of 14% meets requirements given to applicant on project initiation. Follows City concept drawings for S. 7th Ave. See attached drawings given to applicant by City, on January 30, 2014, for use as expected improvements template. It seems appropriate that the determination made by the City consultant for these drawings was that the terrain meets a mountainous scenario in this part of the city which leads to a 13% maximum slope. A 1% steeper grade is then allowed when ROW controls are in place which this proposal includes. See WSDOT Design Manual Figure 440-8.**	A	AASHTO Greenbook Table 6-8 allows for +2% grades (14% Max for Rolling Terrain) in Urban Areas that are less than 500' in length.		A	
37	Plans	C1.0	Site		All lots located along 7th Ave shall have shared driveway access. Provide easement dedication and maintenance agreement.	**Notes on Sheet C1.2 state shared driveway requirements. Easements will be part of Final Plat approval.**	A			A	
38	Plans	C1.0	Site		Lot 64 shall access off of Road B.	**Noted on revised plan set.**	A	Applies to lot 63		A	
39	Plans	C1.0	Site		Access to lot 9 will create a dog-leg in the intersection. How will this be mitigated.? How will access be provided?	**Lot line adjusted.**	A			A	
40	Plans	C1.0	Site		Lots 66 and 67 will not have driveway access due to 30' City water main easement.	**Water easement should not restrict access.**	B	See 2018 Review comment 7.	**Proposed lot lines have been revised such that the 30 foot wide easement for the City water main is not within the boundaries of any proposed bulding lot.**	A	
41	Plans	C1.0	Site		Lots 15, 16, and 65 will be encumbered by the 30' City water main easement and remainder appears insufficient for a home site.	**Plans revised to show potential building envelope.**	B	See 2018 Review comment 7.	**Proposed lot lines have been revised such that the 30 foot wide easement for the City water main is not within the boundaries of any proposed bulding lot.**	A	
42	Plans	C1.2	Road		Reservoir Road (Typical Section E) requires 6' sidewalks on both sides, 4' planter on both sides, and vertical curb and gutter on each side, and 10' shared lanes.	**Shown as typical Section D.**	A			A	
43	Plans	General			Provide a signing and stripping (channelization) plan.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	
44	Plans	General			Pedestrian scale lighting using the City of Sequim standard luminaire is required for local roads and S. 7th Ave. Provide a lighting plan.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	
45	Plans	C3	Utility	Water	Confirm that Hydrant spacing doesn't exceed 500' measured along streets and is no more than 300' measured from the back of any proposed lots.	**Completed**	A	Comment to be addressed in the site construction plans.		A	
46	Plans	C3	Utility	Water	Provide ductile iron resilient seated gate valves; spaced no more than 1000 feet or midblock; 3 valves at T's; 4 valves at crosses, and on 6" service lines to hydrants.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	Condition the preliminary plat

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47	Plans	C3	Utility	Water	Provide air-vacuum assemblies at all isolated high points in the system.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	Condition the preliminary plat
48	Plans	C3	Utility	Water	Provide blow off assemblies at all isolated low points in the system and on at dead ends.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	Condition the preliminary plat
49	Plans	C3	Utility	Water	Provide a minimum of 3-6" cover over all 8-inch or less sized water mains except 4'-0" cover in easements.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	Condition the preliminary plat
50	Plans	C3	Utility	Water	Dedicate water main easement (15' Min.) to PUD for water main distribution system.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	B	Easement must be shown on Preliminary Plat rather than a condition of plat approval.	**A proposed 20 foot wide utility easement has been shown on the Preliminary Plat drawings for a PUD water main extension.**	A	Condition the preliminary plat
51	Plans	C3.1	Utility	Water	Dedicate water main easement (15' Min.) across lot 39.	**Revised plan set shows proposed/potential utility easements.**	B	Easement must be shown on Preliminary Plat rather than a condition of plat approval.	**A proposed 20 foot wide utility easement across lot 38 has been shown on the Preliminary Plat drawings for a PUD water main extension.**	A	
52	Plans	C3	Utility	Water	In addition to standard AWWA acceptance testing, developer to perform hydrant testing following construction of water distribution system to demonstrate available fire flow (1000 GPM, 1Hr, w/ 20psi at services with operation, equalizing, and fire suppression storage volumes depleted) during maximum day demand.	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment will be a condition of the Site Construction permit issued for construction.		A	Condition the preliminary plat
53	Plans	C3	Utility	Water	City Council will ultimately need to approve PUD water service and ownership of the utility. There is no guarantee that they will support PUD service in City limits.	**Noted. Staff has advised they support this proposal.**	B	See City Letter. PUD Water Connection: The location and size of the existing PUD waterline must be identified on the plan. Based on PUD Evergreen Water System maps, an 8-inch water main is adjacent to the southern boundary of the plat. Sheet C3.1 indicates a connection to the PUD water system immediately south of Lot 37. It appears this main is included in the Loma Vista Pressure Zone. In addition, a connection to the existing 6-inch PUD main in 7th Avenue is proposed. It appears from the PUD Evergreen 2010 Water System Plan that this main may be included in the Duxbury Pressure Zone. Provide a hydraulic model and narrative plan to verify that the proposed connections to PUD are a viable alternative for providing water to the plat and how the proposed connection to the City of Sequim water system at the north end of the plat will affect the City.	**Sheets C3.0 and C3.1 show the location and size of existing PUD water lines. Over the duration of this preliminary plat application PACE has met with the representative from Clallam County Public Utility Distric (PUD) water department, Tom Martin. With the City's most recent request to verify that the proposed connections to PUD are a viable option for providing water to the plat, PACE has repeatedly reached out to Mr. Martin requesting documentation in support of the PUD supply of water as desired by the City. Telephone calls and emails have been sent to Mr. Martin with no response. Unfortunately, no documentation is available at this time. Perhaps the continued requests of the City will generate the written response needed?**	A	Condition the preliminary plat
54	Plans	C3.2	Utility	Sewer	Confirm 18" of vertical separation will exist between the Sewer Trunk Line and the Water Main along Road A Stations 10+50 to 14+50, Road D Sta 63+20 and 64+20, 7th Sta 86+ to 86+60, and 7th Sta 95+20 to 96+70.	**Revised plan set shows water/sewer crossings confirming a minimum of 18" vertical separation.**	B	Sheet C3.3: Utility crossings at Road C Station 14+10 and Road D Station 62+74.39 do not appear to provide 18-inch vertical separation. Road D at approximately Station 38+50 does not appear to have adequate horizontal separation between the water and sewer lines	**It is difficult to identify the road and Sta locations cited in the City comments for this item. It is assumed the actual intended comments refer to Sheet 3.2 at Road A Sta 14+40 and Sheet 3.3 at Road D Sta 62+84 with the third location being unidentifiable? All water/sewer crossings are now shown to have approximately 18 inches clearance. Exact utility crossing clearances will be shown during design of the Final Plat construction documents.**	A	
55	Plans	C2 & C3	Utility	General	Sewer truck lines and water mains need to be extended to the boundary of development to accommodate future extensions.	**Revised plan set shows water and sewer lines extended to project boundary.**	A			A	
56	Plans	C2 & C3	Utility	General	Utility castings shall be located outside of bike lanes	**This will be a condition of Preliminary Plat approval to be shown on Final Plat construction documents.**	A	Comment to be addressed in the site construction plans.		A	Condition the preliminary plat
57	Critical Area Report		General		The original geotechnical report (not available in the materials received from the City) and the Follow-up Geologic and Geotechnical Site Assessment and Review of Critical Area Buffer and Building Setback Recommendations for the Proposed Legacy Ridge Plat Development Project Located in Sequim, Washington, Northwestern Territories, Inc., January 26, 2016 should be attached to the Critical Area Study & Buffer Mitigation Plan to provide all the information required to review the plan.	**The Geotechnical Report was submitted to the City for distribution on prior submittal. Geotechnical reports are now attached to the Critical Areas report.**	A			A	
58	Critical Area Report		Section 1		Show the location of Stream D on the Existing Conditions map.	**Stream D has been shown on the Existing Conditions map.**	A			A	
59	Critical Area Report		Section 1		Show the size, in square feet, of the wetlands on the Existing Conditions map.	**Wetland size is shown on the Existing Conditions Map.**	A			A	
60	Critical Area Report		Section 2		The 15-foot building setback from the edge of the wetland buffers, as required per SMC 18.80.070.F.6, should be shown on the Buffer Mitigation Plans.	**This has been included on the revised maps within the Critical Areas Study.**	A			A	
61	Critical Area Report		Section 2.1		Identify if there are impacts to Wetland N from bridge shading and drainage from the bridge.	**It is 3-sided box culvert. The revised report includes a discussion of impacts to vegetation in Section 2.1.**	A	As a condition of the Preliminary Plat approval provide landscaping plans for mitigation areas consistent with Section 9 of the Critical Areas report as part of the Site Construction plans.		A	
62	Critical Area Report		Section 2.1		The additional buffer (1,768 sf) at the east end of Wetland N is not included in the discussion regarding buffer impacts to Wetland N.	**The revised Critical Areas Study includes this additional buffer in the discussion of mitigation for Wetland N.**	A			A	
63	Critical Area Report		Section 2.1		The proposed extension of Reservoir Rd. (Road E) is located primarily within the 100 ft. buffer for Wetland O and appears to be within a few feet of the delineated edge of wetland. Wetland O is the highest category wetland in the proposed development. The plan indicates that this impact is unavoidable. The width of the buffer along Road E does not meet the requirement of SMC 18.80.070(G) for minimum width of buffers if buffer averaging is applied. An alternative alignment to Road E should be explored to minimize the permanent impact to the Wetland O buffer.	**Road E has been shifted to reduce the impact to the Wetland O buffer. Buffer enhancement will take place between Road E and Wetland O to provide additional protections to the wetland.**	A			A	
64	Critical Area Report		Section 2.1		The impact to the wetland buffer for Wetland O near the intersection of S 7th Avenue and Road B is not quantified or identified on the Buffer Mitigation Plan – Inset 1.	**This impact is shown on Sheet 3 of Appendix C of the revised Critical Area Study.**	A			A	

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Comment No.	Doc.	Page	Section	Reviewer	2016 City Comment	Applicant Response January 2018	Status	City Follow-up Comment June 2018	Applicant Response December 2018	Status 2	Preliminary Plat Condition
65	Critical Area Report		Section 2.1		The information provided in the table at the top of page 4 does not match the information provided on the Buffer Mitigation Plan – Inset 1. The totaled amounts are not correct.	**The revised Critical Area Study contains updated impact and mitigation numbers. Impacts and mitigation areas are shown on both Sheet 3 and Sheet 4 of the Critical Areas Study.**	A			A	
66	Critical Area Report		Section 5		Provide the size of the delineated wetland in the description of each of the wetlands.	**This has been added to the revised Critical Areas Study.**	A			A	
67	Critical Area Report		Section 5		Identify how wetland M will maintain connectivity with Stream G in the developed condition.	**There are no impacts to Wetland M or buffer proposed. The pipe that will cross Stream G and associated buffer will be anchored on the ground surface and will be elevated across the stream channel to avoid any impacts to Stream G. This will allow the wetland and stream complex to continue to function in its current state.**	A	Construction detail showing elevated drainage pipe crossing with support structure outside the stream buffer to be addressed in the Site Construction drawings.		A	
68	Critical Area Report		Section 5		Identify how wetland N will maintain connectivity with Stream H in the developed condition.	**Wetland N does not have a surface connection to Stream H.**	B	Please provide concurrence from the Wetland Biologist that Wetland N and Stream H are not hydraulically connected via surface or subsurface flow. If connected, how will the connectivity be maintained by the proposed development.	**While there is no channel or other observed above ground connection between Wetland N and Stream H, it is possible that surface water may flow from Wetland N to Stream H during large storm events. To ensure that surface water flow from Wetland N would reach Stream H post-developement, the Preliminary Plat plans now show a culvert at the west edge of the Wetland N buffer that goes under Road B and outlets to the buffer of Stream H.**	A	
69	Critical Area Report		Section 5		It appears from the Preliminary Storm Drainage Report for Preliminary Plat, Legacy Ridge, PACE Engineers, Inc., Revised July 19, 2016 and Legacy Ridge 1 Preliminary Plat plan set (4/22/2016) that there will be an outlet from Wetland P to the drainage ditch on the north side of the S. 7th Street right-of-way. If this is the case discuss how this wetland will maintain the existing hydro period.	**Wetland P is a depressional wetland located on a gradual slope (approx. 3%). The emergency overflow pipe is located 72 feet downslope of Wetland P. This pipe will only capture water that has already moved through the wetland and was not retained, and any overland flow that would not have naturally reached the wetland. The hydrology of Wetland P will not be altered by the emergency overflow pipe.**	A			A	
70	Critical Area Report		Section 6.0		Include discussion of the Northern Spotted owl Management Buffer located on or near the southeast portion of the site.	**Refer to WRI Response Letter dated 1/8/2018.**	A			A	
71	Critical Area Report		Section 7.3		7.3.4 Wetland O. Revise the identification of Wetland A to Wetland O (3rd sentence).	**This change has been made in the revised report.**	A			A	
72	Follow-up Geologic and Geotechnical Site Assessment				The Geotechnical Site Assessment recommends Geological Hazard Buffers of 25 feet for a "Very Low Hazard" steep slope area and 35-foot buffers for "Low Hazard Slopes" and requires these areas to remain undeveloped. We do not have any comments regarding the Geotechnical Site Assessment and review of the Critical Area Buffer and Building Setback Recommendations.	**Agreed**	A			A	
73	Traffic Impact Analysis				The S 7th Ave and E Silberhorn Rd intersection was analyzed as an Idealized T-Intersection. However, there are existing geometric deficiencies at this intersection that should be identified and addressed in the impact analysis. There may be additional mitigation required at this intersection.	**It is not clear what the "geometric deficiencies" are referenced in the comment, but it is assumed this is in reference to the fact that the intersection does not have standard control since the eastbound-to-northbound and southbound-to-westbound movements are free and the northbound approach has stop-control. Due to the unique configuration, the analyzed with the northbound approach having stop-control (the current configuration) and as all-way stop-control. This was discussed in paragraph 2 of Section 7.1 of the February 2016 report. The intersection was shown to operate at LOS A (the best level) under both configurations. The analysis does not show that the intersection should be converted to all-way stop-control and would operate acceptably under the current configuration.**	B	See June 2018 traffic impact analysis comments (Reference letter from TSI to City of Sequim dated June 18, 2018) - Action items have been to added to the "PW Comments June 2018" section of this matrix	**See sheet C1.4. A detail window of the S 7th Ave / E Silberhorn Rd intersection has been provided showing that as part of the Preliminary Plat approval conditions the existing stop sign and stop bar on the northbound leg of this intersection is proposed to be moved approximately 33 feet north to improve sight distance/visibilty conditions.**	A	
74	General				Please note that approval of the preliminary plat by the city, consistent with the provisions of SMC Title 20, shall constitute authorization for the subdivider to develop the subdivision's facilities and improvements in strict accordance with final design and/or construction drawings which have been reviewed and approved by the public works director, with state laws, this title and all applicable conditions of the preliminary plat approval. Additional design and construction drawing detail will be necessary prior to issuing a Right-of-Way/Site Construction Permit.	**Agreed**	A			A	

Rec'd by City of Sequim
DCD/Public Works
12/28/18

Legacy Ridge

Review Comments with Responses

Milestone: 2016 Preliminary Plat

Legacy Ridge 1 Project (SUB15-001 & SEP15-001) - DCD Staff Comments

Resolution Code Legend

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Comment No.	Doc.	Page	Section	Reviewer	2016 City Comment	Applicant Response January 2018	Status	City Follow-up Comment June 2018	Applicant Response December 2018	Status 2	Preliminary Plat Condition
1	Public comments				Staff provided the public comment letters to the applicant for review. The public comments go to Planning Commission and City Council with Staff responses. Staff prepared the PublicCommentbyTopic_12-16-16 spreadsheet from the comments received from the public. Provide a response to the comments by topic. See the spreadsheet and the fields designated for applicant response.		B	More public comments will likely be received as part of the formal review process.	**Acknowledged**	A	
2	General Comments				The owner's representative Lynn Moreno contacted the City to include Anita Searcy in the correspondence for the project. Please confirm Anita Searcy is the owner to be contacted.	**THE LANDOWNER'S EXCLUSIVE REPRESENTATIVE FOR THE LAND USE APPLICATION IS AS SHOWN IN THE OFFICIAL APPLICATION DOCUMENTS. PACE ENGINEERS – STEVE CALHOON.**	A			A	
3	General Comments				See the Public Works comment log concerning water availability requirements.	**SEE PUBLIC WORKS RESPONSE MATRIX.**	B	See City Letter	**Over the duration of this preliminary plat application PACE has met with the representative from Clallam County Public Utility Distric (PUD) water department, Tom Martin. With the City's most recent request for a letter of concurrence to City conditions of approval from PUD, PACE has repeatedly reached out to Mr. Martin requesting a letter of support as desired by the City. Telephone calls and emails have been sent to Mr. Martin with no response. Unfortunately, no letter is available to provide to the City to express concurrence with the proposal from PUD. Perhaps the continued requests of the City will generate the written response needed?**	A	Condition the approval, if PUD is to serve subdivision, add redundancy, upsize transmission lines and provide emergency power at booster stations.
4	General Comments				Open space is not a requirement of this project	**THE APPLICANT DESIRES TO MAINTAIN OPEN SPACE AS PROVIDED IN THE PRELIMINARY PLAT DOCUMENTS.**	A			A	
5	General Comments				A Boundary Line Adjustment must be reviewed, approved and recorded prior the preliminary plat approval.	**BLA SHOULD BE A CONDITION OF PRELIMINARY PLAT APPROVAL AND REQUIRED TO BE RECORDED PRIOR TO CONSTRUCTION DOCUMENT APPROVAL.**	B	BLA required prior to or concurrent with the Preliminary Plat	**The BLA Application will be provided prior to the Preliminary Plat Hearing.**	A	Condition of Plat Approval
6	General Comments				All streets shall be stubbed to the property line and shall show as full streets on the preliminary plat. There are two street locations, that appear to be critical areas, in the southwest portion of the proposed plat between lots 32 and 33, and between lots 31, Tract Q1 and Tract K. If these two streets impact critical areas (CA), the CA plans shall be updated to mitigate for the impact of the inclusion of the stubs in these locations.	**PLANS HAVE BEEN REVISED TO EXTEND STREETS TO PROPOSED PROPERTY LINES.**	A			A	
6a	General Comments				Street connections must connect to the property lines with full infrastructure built. A temporary turn-around must be provided. See Turn-around Template provided as an attachment.	**PER INTERNATIONAL FIRE CODE, EDITION 2015, AND CLALLAM FIRE DISTRICT NO. 3, FIRE MARSHALL STEVE JACKSON, FIRE CODE TECHNICIAN, PROVIDING GUIDANCE AND JURISDICTION REGARDING THE TURN-AROUND REQUIREMENTS, THE CODE READS: "DEAD-END FIRE APPARATUS ACCESS ROADS MORE THAN 150 FEET IN LENGTH SHALL BE PROVIDED WITH AN APPROVED AREA FOR TURNING AROUND FIRE APPARATUS." NO DEAD-END ROADS EXCEEDING 150 FEET ARE PROPOSED IN THE REVISED PRELIMINARY PLAT DOCUMENTS. NO TURN-AROUNDS ARE REQUIRED OR PROPOSED.**	A			A	Condition of Plat Approval
6b	General Comments				The plan set shows the wetlands and critical areas abruptly ending where these streets need to connect. The Critical Areas plan needs to account for the required road infrastructure in the Critical Areas analysis and in the mitigation. Sheet C2.1 is unclear concerning the edges of Tracts J and K. Does the CA continue within the area shown for future road?	**ACKNOWLEDGED AND ADDRESSED IN REVISED CRITICAL AREAS REPORT.**	A			A	
6c	General Comments				Are these road connections feasible in this location? Provide a profile showing how the connections can actually occur. (For instance, it appears that the connection to the west connect to a steep slope and lead to a wetland.)	**CONCEPTUAL EXTENSION PROFILES OF ROADS A, C & D OFF-SITE HAVE BEEN COMPLETED ON THE REVISED PLAN SET. THE FEASIBILITY OF A CONNECTION TO THE WEST LOOKS CHALLENGING AND IS NOT SUPPORTED BY THE APPLICANT. THIS WAS A REQUEST OF PREVIOUS CITY STAFF TO CONSIDER THIS CONNECTION. POTENTIAL FUTURE DEVELOPMENT PLANS OF ADJOINING PROPERTIES ARE BEYOND THE SCOPE OF THIS PRELIMINARY PLAT APPLICATION.**	B	Extensions of Roads A, C, and D to remain in plans. Furthermore, provide a 60' wide easement for extension of Road D through parcel to the west of plat boundary as part of the BLA.	**The alignment of a potential future extension of Road D (westerly / off-site) is dependent upon additional site reconnaissance to determine feasibility of a roadway connection and potential site development plans of the Boyd Property. The easement requested can not be provided at this time. However a Condition of Approval can be placed on the Preliminary and Final Plat stating: *" At such time the westerly property seeks to develop, efforts shall be made to evaluate the feasibility of making an east-west roadway connection to roadway D of Legacy Ridge."***	A	Condition the approval

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7	General Comments				The Comprehensive Plan promotes well-connected mobility networks. The Plan specifies that development of new local streets forms a well-connected network that provides for safe, direct, and convenient access to the existing roadway network for automobiles, bicycles and pedestrians. The plan also encourages a grid street system. The grid pattern of blocks are defined by local access streets in the design of new subdivisions to avoid concentration of vehicle trips, improve safety to neighborhood streets, enhance community connectivity and provide route options for all modes of travel. The connectivity design guidelines encourage intersection spacing of 300 — 450 feet. The plan encourages the most direct routes but also recognizes the need to avoid critical areas. Provide a street design that connects local and collector streets to future adjacent subdivisions.	**THE PRELIMINARY PLAT DOCUMENTS ARE CONSISTENT WITH THE CONNECTIVITY DESIGN GUIDELINES AND ENCOURAGES INTERSECTION SPACING OF 300 - 450 FEET.**	A			A	
8	Landscape/ Lighting				Provide the deciduous tree planting detail showing the root guard version to protect streets and sidewalks from roots. See attached RootGuardStreetTreePlantingRequirement.pdf.	**TREE PLANTING DETAIL ADDED TO REVISED PLAN SET.**	A	Comment to be addressed on the Site Construction permit plans.		A	
9	Landscape/ Lighting				Continue the street tree pattern to the property lines with the street extensions to the property lines between lot 32 and 33 and also between lot 31 and the open space to the north of it.	**PLANS REVISED TO COMPLY WITH COMMENT.**	A			A	
10	Landscape/ Lighting				Coordinate the street light plan with the street tree plan as discussed in the Public Works sheet.	**SEE PUBLIC WORKS RESPONSE MATRIX.**	A	Comment to be addressed on the Site Construction permit plans.		A	
11	Lot Design				Lot 9 and Lot 69 are shown at an intersection. This design pattern will not work for traffic safety purposes.	**LOT 9 WILL OBTAIN DRIVEWAY ACCESS FROM ROAD "B". LOT 69 (NOW LOT 68) HAS BEEN ENLARGED TO ALLOW FOR A CAR TURN-AROUND "ON-LOT" AND WILL ALSO SHARE THE CURB CUT WITH THE ADJOINING LOT (NOW LOT 67).**	A			A	
12	Lot Design				Access Lot 64 from Road B, not South 7th Avenue. Show the limits of no access lines on the plat.	**LOTS OF LIMITED ACCESS ARE LISTED IN THE REVISED PLAN SET NOTES ON SHEET C1.2.**	A			A	
13	Lot Design				Irrigation line is shown running through Lot 79. How does this influence the ability to build out the lot?	**IRRIGATION LINE MOVED ON REVISED PLAN SET.**	A			A	
14	Lot Design				The grade changes abruptly in the middle of Lots 24 through 29, Lots 33 through 36, Lots 50 through 53 and Lots 70 through 78. Explain how those lots will develop with such an abrupt grade change. (House, drive access, driveway grades). Modify the grading plan to account for where the houses will be located on the site.	**PLANS DESCRIBE 2:1 GRADE BREAK OF A DAYLIGHT BASEMENT. FINAL GRADING WILL BE DETERMINED BY BUILDER DURING BUILDING PERMIT PROCESS.**	A			A	
15	Lot Design				Lots which are bordered by two more or less parallel streets shall be permitted access to only one of these streets. Identify limits of no access on the street where there will be no access for lots falling under this standard.	**LOTS OF LIMITED ACCESS ARE LISTED IN THE REVISED PLAN SET NOTES ON SHEET C1.2.**	A			A	
16	Lot Design				Width of lots at the building line shall conform to the requirements of the zoning code. Show the front building line on the individual lots. The zoning code at the time of this application submittal required that lots be 50' at the front building line.	**LOT WIDTHS CONFORM TO SMC CHAPTER 18, LOTS ARE 50' AT FRONT SETBACK LINE IN REVISED PLAN SET. SEE TYPICAL LOT DETAIL ON SHEET C1.2.**	A			A	
17	Lot Design				Show shared driveways for the lots located along 7th Avenue. Place a statement on the plat and shared access easements.	**LOTS OF LIMITED ACCESS ARE LISTED IN THE REVISED PLAN SET NOTES ON SHEET C1.2.**	A			A	
18	Lot Design				New minimum lot standards are available with the update of the zoning code R4-8 standards adopted in September 2016. Lot sizes and minimum setbacks have been reduced. If interested, talk to staff about the new code standards and if it is applicable to the Legacy Ridge Subdivision.	**ACKNOWLEDGED.**	A			A	
19	Lot Design				Sidewalks shall be 6' in width.	**ACKNOWLEDGED. SIDEWALK WIDTH SHOWN AS 6 FEET ON REVISED PLAN SET.**	A			A	
20	Lot Design				Houses shall not be constructed over utilities and easements. See Public Works comments.	**ACKNOWLEDGED.**	B	See 2018 Review comment 7.	**Lot lines have been modified to protect water lines.**	A	
21	Lot Design				Work with the Highland Irrigation District (HID) to provide easements for the main irrigation lines. Contact Ben Smith, Director at bsmith@olypen.com or at 360-460-9499. Show the existing location and the new easements on the preliminary plat document. Lot design may need to reorient considering the location of the line.	**IRRIGATION DISTRICT LINES WILL BE LOCATED IN BUILDING SETBACK ZONES. ANY REQUIRED EASEMENTS WILL BE INCLUDED IN THE FINAL PLAT CONSTRUCTION DOCUMENTS. COORDINATION WITH HID IS IN PROCESS.**	A			A	
22	Lot Design				Dedicate the easement for the irrigation lines serving individual parcels. This is an easement that should be described in the maintenance agreement. Who is responsible for ownership and maintenance? Provide more detail for the irrigation easements. Show all of the irrigation line on the plan sets. Sheet C2.0 shows the irrigation line ending by Lot 2.	**IRRIGATION DISTRICT LINES WILL BE LOCATED IN BUILDING SETBACK ZONES. ANY REQUIRED EASEMENTS WILL BE INCLUDED IN THE FINAL PLAT CONSTRUCTION DOCUMENTS. COORDINATION WITH HID IS IN PROCESS.**	A			A	
23	Lot Design				Do not show tree plantings or constructing structures within 10 feet of an open ditch or pipeline unless there is approval in writing from the HID Board.	**CORRECTION NOTED.**	A			A	

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24	Lot Design				Provide a letter of approval from Highland Irrigation District in support of the design and easements shown on the preliminary plat.	**COORDINATION WITH HID IN PROCESS.**	B	Provide letter of approval	**Over the duration of this preliminary plat application PACE has met with the representative from Highland Irrigation District (HID), Ben Smith. The design of the Irrigation system has been modified in accordance the specifications required of the HID, as well as plans have been proveded to HID. With the City's most recent request for a letter of approval from HID, PACE has repeatedly reached out to Mr. Smith requesting a letter of support as desired by the City. Countless telephone calls and emails have been sent to Mr. Smith with no response. Unfortunately, after literally months of outreach to HID, no letter is available to provide to the City to express concurrence with the proposal from HID. Perhaps the continued requests of the City will generate the written response needed?**	A	Condition the Preliminary Plat Approval
25	SEPA Checklist				Question 9 of the Environmental Checklist asks, "Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain." The response states, "Potentially, subject to recovery of the local real estate market." SEPA.	**AS OF THIS DATE, THERE ARE NO PLANS FOR FUTURE ADDITIONS, EXPANSION, OR FURTHER ACTIVITY RELATED TO OR CONNECTED WITH THIS PROPOSAL. CHECKLIST HAS BEEN REVISED.**	A			A	
26	Wildlife				The Washington Department of Fish and Wildlife website identifies a regular concentration of Roosevelt Elk and a Management Buffer for the Northern Spotted Owl.	**AS UNDERSTOOD BY THE APPLICANT'S BIOLOGIST, THE PREVIOUS CONCERNS ARE NO LONG AN ISSUE, FOLLOWING A CONVERSATION WITH CHARISSE DESCHENES. PLEASE REFER TO THE UPDATED CRITICAL AREAS STUDY AND MITIGATION REPORT PREPARED BY WETLAND RESOURCES.**	A			A	
27	Wildlife				Provide a habitat management plan per Chapter 18.80 CRITICAL AND ENVIRONMENTALLY SENSITIVE AREAS PROTECT:01\1 see 18.80.070 Development standards.	**NO LONGER A CONCERN PER ITEM NO. 26 ABOVE.**	A			A	
28				Rick Mraz, PWS	Based upon a comparison of GPS points with field investigations, Wetland 0 extents may extend slightly farther south than as shown in the delineation. We dug three test pits south the GPS-delineated edge of Wetland O's southern boundary. All of these pits met hydric soil indicator F6. Thus, this boundary was going to be revised and expanded approximately 20-25' southward. We observed most of the remaining delineated wetlands onsite and, based upon those observations, I can conclude that the remainder of the delineation is valid and accurate.	**PLEASE REFER TO THE MODIFIED WETLAND MAPPING. THE BOUNDARY WAS REVISED AS REQUESTED BY MR. MARZ. PLEASE REFER TO THE UPDATED WETLAND MAPPING AND REVISED PLAN SET. THE PROPOSED REALIGNMENT OF THE ROADWAY HAS BEEN MOVED SOUTHEASTERLY. WETLAND BUFFER IMPACTS ARE REDUCED. WETLAND BUFFER IMPACTS ARE MITIGATED VIA ENHANCEMENT / REMOVAL OF INVASIVE SPECIES. PLEASE REFER TO THE UPDATED CRITICAL AREAS STUDY AND MITIGATION REPORT PREPARED BY WETLAND RESOURCES.**	A			A	

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 17, 2019

Barry Berezowsky, Director
City of Sequim
Community Development Department
152 West Cedar Street
Sequim, WA 98382-3317

Dear Barry Berezowsky:

Thank you for the opportunity to comment on the optional mitigated determination of nonsignificance/notice of application for the Legacy Ridge Subdivision Project (SEP15-001, SUB15-001) as proposed by PACE Engineers for Irvin Boyd Family Limited Partnership. The Department of Ecology (Ecology) reviewed the environmental checklist and information provided by the State Environmental Policy Act (SEPA) Lead Agency, City of Sequim has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE:
Richard Mraz, Wetlands/Shorelands Specialist (360) 407-6221

Ecology has reviewed the critical areas study and offers the following comments:

1. Ecology requests the opportunity to confirm the wetland delineation. Test pit S7 is documented to have wetland hydrology and wetland vegetation during the growing season, and that location appears to be excluded because the soil is one color chip away from meeting a hydric soil indicator. Hydric soil indicators are "test positive", which means that because a soil does not meet an indicator is not conclusive evidence that the soil is not hydric. The presence of wetland hydrology during the growing season meets the definition of hydric soil.

2. The wetland delineation test plot map (Sheet 1 of 4) does not show a "paired" plot approach to delineation, thus it is unclear how the wetland edge was determined. Based on the numbering of the delineation sheets in the report, it does not appear that all data sheets were included. Please provide all the delineation data sheets to Ecology.

3. The wetland delineation is more than 5 years old. Generally, any delineation done more than five years ago needs to be revisited. This is due to several factors:
    - Wetlands can change significantly in a five-year period due to changes in hydrology, land uses, and plant species composition.
    - Approved jurisdictional determinations by the Corps expire after five years (see the Corps' Regulatory Guidance Letter 05-02, Expiration of Geographic Jurisdictional Determinations?).
    - The Corps' 1987 wetland delineation manual has a requirement for comprehensive determinations to "quantitatively describe the vegetation in the past five years" (page 41, Step 5).

Revisiting a wetland delineation that is five or more years old does not necessarily mean a new wetland delineation needs to be done. It means it may be necessary to revisit the site to determine whether the delineation is still accurate or needs to be redone based on current conditions.

Please contact Rick Mraz, Ecology Wetlands/Shorelands Specialist at Richard.Mraz@ecy.wa.gov or (360) 407-6221 to arrange a confirmation site visit.

WATER QUALITY/WATERSHED RESOURCES UNIT:
Chris Montague-Breakwell (360) 407-6364

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:
The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
    a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and

3. Any size construction activity discharging stormwater to waters of the State that Ecology:
   a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
   b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/ - Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(MLD:201903108)

cc: Richard Mraz, SEA
Chris Montague-Breakwell, WQ
Steve Calhoon, PACE Engineers (Agent)
Irvin Boyd Family Limited Partnership (Proponent)

Allyson Brooks Ph.D., Director
State Historic Preservation Officer

June 17, 2019

Mr. Tim Woolett
Senior Planner
City of Sequim
152 W. Cedar Street
Sequim, WA 98382

In future correspondence please refer to:
Project Tracking Code: 2019-06-04334
Property: City of Sequim Legacy Ridge Subdivision Preliminary Subdivision Application No. SUB15-001
Re: Archaeology - Survey Requested

Dear Mr. Woolett:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. As a result of our review, our professional opinion is that the project area has the potential to contain archaeological resources. Therefore, we recommend a professional archaeological survey of the project area be conducted prior to ground disturbing activities. We also recommend consultation with the concerned Tribes' cultural committees and staff regarding cultural resource issues.

The project is located in an area determined to be at moderate to high risk of containing archaeological resources according to the DAHP predictive model. The project is also located in close proximity to the Manis Mastodon site, the oldest archaeological site in Washington State, and additional megafauna remains have been uncovered in the area. Although naturally deposited palaeontological remains are not covered by archaeological laws, megafauna remains that have been cut or modified by humans, or that are found in close proximity to artifacts are considered archaeological resources and can only be legally excavated by a professional archaeologist.

If any federal funds or permits are associated with this proposal, Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36 CFR 800, must be followed. This is a separate process from both the NEPA and SEPA environmental review processes and requires formal government-to-government consultation with the affected Tribes and the SHPO. Also, we appreciate receiving any correspondence or comments from concerned tribes or other parties concerning cultural resource issues that you receive.

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices, photos, etc. must now be submitted in PDF or JPG format. For more information about how to submit documents to DAHP please visit: http://www.dahp.wa.gov/programs/shpo-compliance. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to comment on this project and we look forward to receiving the survey report. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. Should you have any questions, please feel free to contact me.

Sincerely,



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