CITY OF SEQUIM

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July 21, 2025

Sam Nielson
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Subject: Westbay Master Plan - Technically Incomplete

Dear Sam:

The City of Sequim has completed its technical completeness review of the Westbay Master Plan, located between Sequim Bay Road and SR 101, which was determined Counter Complete on June 23, 2025.

The submitted application was reviewed by the City's Development Review team. The review results in a ***Technically Incomplete*** determination as of July 21, 2025.

In reaching the technical incomplete determination, the City references SMC 20.01.130(B) "Review for Technically Complete Status" and the statement "*The review for technically complete status will include, at a minimum, review of the submitted application, drawings, studies, and any other materials requested by the city*." The City references SMC 18.30.035 Contents of master plan as the initial baseline for its technical complete review, as well pre-application conference summary and adopted City development standards.

Attached to this letter outline the deficiencies identified by the City Community and Economic Development and Public Works Department Staff that contributed to the technically incomplete determination.

Sincerely,

Travis Simmons
Senior Planner

c: Jeff Gunderson, Seabrook Land Company

The City of Sequim Community and Economic Development and Public Works Departments reviewed the materials submitted and counter completed on June 23, 2025 for the Westbay Master Plan and Overlay Rezone. Below are comments and identification of items that are missing, incomplete, or inconsistent, and collectively contribute to the technically incomplete status. The following comments are not and should not be considered a full review by the City of Sequim. Rather, the comments identify the minimum necessary for the City to determine the application technically complete so full technical review can commence; additional comments, questions and requests for information are to be expected.

Department of Community and Economic Development (DCED)

1. Master Plan Narrative: The Westbay Master Plan (dated June 6, 2025) does not present itself as a fully developed master planning document, sufficient in meeting its purpose to effectively communicate to the public, City officials and the review authority, the proposed project in appropriate detail. While the submitted Master Plan document is over 500 pages, the actual Master Plan narrative appears to be only 4 pages. The technical components in the appendices are not integrated into the Master Plan narrative, ensuring that a complete understanding of the project is described within the narrative itself. Instead, the submittal leaves it to the reader to try to determine the actual project scope, its impacts, and proposed mitigations.

    - To assist in understanding the City's expectations for a complete master plan that can be sufficiently reviewed, below are examples of master plans that include narrative, description and integrated technical contents. While both plans are not exact representations to Westbay Master Plan, they can provide reference to the format, detail and information that is to be included in a master plan narrative, supported by appendices. (See SMC 18.30.035 also).

      City of Pasco - Broadmoor Master Plan

      https://www.pasco-wa.gov/DocumentCenter/View/64884/Broadmoor-Master-Plan-Adopted-April-17-2023-?bidId=

      Town of Steilacoom – Chambers Bay Master Planned Development

      https://townofsteilacoom.org/DocumentCenter/View/4092/Chambers-Bay_Permit-Application-Narrative

2. Quality Control/Internal Inconsistencies: Throughout the Master Plan and appendices, there are numerous instances where quality control review is needed. Examples include:

    - Project description varies between documents.
    - Ensure the same full-build out number of residential units and square footage is presented consistently throughout the Master Plan and technical appendices.
    - The scale on the civil drawings is incorrect.
    - The narrative and portions of the submittal refer to other types of planning documents, such as development agreement, subdivision and subarea plan, as being part of the Master Plan submittal. None of these are included with the submitted documents.
    - Various inaccuracies (incorrect street names, typos).

- Paths, Parklands and Land Parcels are incorrectly color coded.

3. SEPA Checklist:
   - The SEPA Environmental Checklist includes inconsistencies between the Master Plan's project description and supplemental consultant reports. Similar to #2 above, attention to presenting consistent project information throughout the documents is required.

   - The State Environmental Policy Act (SEPA) Checklist does not adequately incorporate information from appendices' technical specialized documents and impacts are not fully defined. The SEPA checklist is used by local governments to help determine whether a project's impacts are likely to be significant. The environmental checklist needs to be completed to answer each question with enough detail to determine 1) what the project impacts are, 2) whether there are measures incorporated into the proposed project that avoid, minimize, or counter the adverse effects of the impacts, and 3) when compensatory mitigation is proposed that will offset identified impacts.

   - The SEPA Checklist is unsigned.

4. Critical Areas:
   - According to the Critical Area Report, the following critical areas are within or adjacent to the subject site: Pitship Pocket Estuary; Johnson Creek (Type F), Pitship Creek (Type F), Stream "A" (Type NS, tributary to Johnson Creek), and Sequim Bay (Type S water). Ensure all regulated critical areas and appropriate buffers on depicted on the Master Plan drawings consistently.

   - Additional discussion and evaluation of the NWI mapped freshwater emergent wetland must be included in the Critical Areas Report.

   - The Critical Areas Report must specifically address proposed encroachment or impacts to critical area buffers; review SMC 18.80 to determined exemption status or requirements. Additional information and proposed mitigation may be necessary. (Stream crossing (Stream "A"), proposed trail location and potential lot locations to stream buffer edge, are preliminarily identified as needing additional evaluation.).

   - The proposed use of interrupted buffer provisions (SMC 18.80.070.A) is not evaluated at this time but is noted additional review may be necessary.

   - The Pitship Pocket Estuary buffer may be subject to the provisions of Shoreline Master Program, which has different buffer widths for wetlands located within the shoreline jurisdiction.

   - The SEPA checklist must include the information and various soil conditions identified in the Geotechnical Report. Geologically hazardous areas must be identified on the Master Plan drawings.

   - The Preliminary Stormwater Report will need to include analysis of receiving waters for flow rates, duration, wetland hydroperiods and water quality; coordination with Critical Areas consultant may be needed to ensure appropriate measures and mitigations are identified.

- It appears direct stormwater discharge to West Sequim Bay is under consideration; include in the Critical Areas Report, analysis and appropriate measures and mitigations that may be necessary for the shoreline.

- The location of the lift station is proposed to be located within the shoreline jurisdiction and adjacent to the Pitship Pocket Estuary. The Critical Areas Report will need to appropriately evaluate, address and mitigate the proposed location.

- Third party review of critical area reports, at the applicant's expense, will be required as part of the full application review process.

5. Fire and Emergency Response: Review of the submitted civil drawings has been completed by the City's Fire Marshal. Sufficient detail and/or discussion within the Master Plan on how the following requirements are or will be met is required:

    - Fire Flow requirements for buildings must meet requirements of the Washington State Fire Code Appendix B.

    - Fire hydrants must meet the requirements of Washington State Fire Code Section 507 and Appendix C, and SMC 17.48.040.

    - Fire apparatus roads must meet the requirements of the Washington State Fire Code, Section 503 and Appendix D.
        - It is unclear from the civil drawings submitted whether all the apparatus access roads meet the minimum width requirements.
        - The road grades proposed exceed City standards. Per the Washington State Fire Code, Appendix D, Section D103.2, fire apparatus access roads may not exceed 10 percent in grade. Grades proposed are steeper than 10 percent and will require approval of the City Fire Marshal, Clallam County Fire District #3 and City Public Works Department.

    - Fire lanes must meet the requirements of the Washington State Fire Code, Appendix D and the Sequim Municipal Code 15.04.061.

6. Master Plan Contents - SMC 18.30.035:

    - Existing Conditions: Review SMC 18.30.035(A)(4)(5)(6) as it requires a more extensive existing condition section of the Master Plan than is currently provided within the narrative. While most of this information may be included in the technical documents included in appendices, the master plan document is the vehicle to present and summarize the information in narrative form, supported by graphics or references to other documents/sheets within appendices. A reader should be able to understand the Master Plan's existing site conditions through this section of the Plan.

        - Proposed Master Plan: SMC 18.30.035.B requires description of all proposed development within the subject site. As mentioned in DCED Comment #1, a more developed master plan is required. The following are additional comments on the content requirements:

            - Underlying Zoning: The underlying zoning is R4-8 (See SMC 18.20.150, 18.30.027 and 18.30.040.A). The commercial use areas of the Master Plan may

need amendments to the comprehensive plan and zoning map. (SMC 18.30.035.B.1).

- Number of units and/or gross square footage and density: The proposed total number of units is unclear. Page 3 states the proposal is up to 650 residential units; however, the rest of the sentence states 600 total lots and up to 300 multi-family units, with some in mixed use commercial, and single-family detached lots are expected between 250 and 550. Further, the overall gross density of 9.5 du/acre reported appears to be incorrect.

  Clarification of actual number of dwelling units proposed is required and must be applied consistently throughout all documents. Please provide unit or square footage information, by total and by phase:
  - Single Family Detached Units (individual lots)
  - Multi-Family Attached Units (specify number as fee simple lots, condominium)
  - Multi-Family Units within Mixed Use Structure
  - Total square footage of Commercial use, and square footage of Commercial by Mixed Use Structure

  The acreage/square footage breakdown for the entire site is required to be applied consistently throughout all documents. Please provide:
  Acreage for all lots combined
  Acreage for public rights of way
  Acreage of open space (further refine to acreage for private open space and publicly accessible open space)
  Acreage of critical areas: wetlands + buffer (define total and buffer only)
  Acreage of critical areas: stream + buffer (define total and buffer only)
  Acreage and lineal feet of trails
  Acreage of stormwater facilities
  Acreage of landscaping

  Provide information on lot sizes proposed for single family detached and multi-family attached, in tabular form. Please provide a site plan drawing that includes lot numbers on proposed fee-simple lots.

  Clarification of density is required, and must be applied consistently throughout all documents, by total and by phase. Calculation of density must be:
  Gross density: 160 gross acres/total number of residential units = gross density
  Net density: XX net acres/total number of residential units = net density
  Net acre calculation: total acreage minus acreage devoted to public right of way, critical areas and buffers, open space areas and surface storm drainage facilities.

- Site Improvements: Please review SMC 18.30.035.B.4. While some of the elements are depicted on Illustrative Master Plan Drawing, not all are; the drawing is conceptual and difficult to determine specifics of building footprints, surface or structured parking facilities, and landscaped areas.

- Preliminary Infrastructure Plan: See Public Works Comments #1 and #2.

- Summary of Transportation Facilities: Please review SMC 18.30.035.B.5. Not all this section's requirements have been submitted, including parking impact study, description of potential parking and pedestrian impacts, and appropriate measures to mitigate impacts. See also Public Works Comments #3 and #4.

- Environmental, Historical/Cultural, Open Space: See DCED Comment #4.

- Architectural Design Standards: Building architectural renderings and illustrations are required to be included with the submitted design standards.

- Alternative Development Standards (see also SMC 18.30.040.C): A "Proposed Zoning Table" is included, presumably identifying the desired alterative development standards from the underlying zoning of R4-8. Per this section, the specific application of the alternative development standards must be provided. Ensure that all proposed alternative development standards are clearly and fully compared and contrasted with existing standards in this section of the Master Plan. The comparison should include an explanatory narrative that justifies deviation.

- Phasing Plan: A more detailed Phasing Plan is required and must include at a minimum: number of units and buildings/square footage by phase; improvements by phase (i.e. utilities, transportation improvements, streets, parking); open space and recreational amenities by phase. Each phase will need to be stand alone, meaning the infrastructure needed for a specific phase will need to be in place and not reliant on a future phase to meet requirements.

- Innovative Planning Techniques, Enhanced Site Elements: This requirement is not directly addressed, although in general, discussion on the compact mixed-use development is the foundation of the proposed Master Plan. Additional narrative to fully address this requirement is needed.

- SEPA Checklist: See DCED Comment #3.

7. Master Plan Development Standards - SMC 18.30.040.D: This section requires an analysis of the advantages and positive benefits of the proposed Master Plan to the Sequim community, and how the proposed alternative development standards enhance and benefit the residents of the Master Plan and larger Sequim community. The analysis provided is insufficient to determine the advantages and positive benefits to the greater Sequim community. While the response references areas within the Master Plan that will be open to the public, it does not specify what features are intended for public access, where they are located, or whether that is the only benefit provided to the broader Sequim community. In addition to public access, an example of a community-wide benefit could include enhancements to the existing Olympic Discovery Trail.

Public Works Department

1. Utilities:
   Preliminary Utility Reports were not submitted.

- Water: A Preliminary Water Utility Report detailing assumptions, head losses, average and maximum demand, residential residual pressures, fire flow conditions, etc. is required. All submittals will be reviewed by a third-party consultant. All utility submittals will be reviewed by a third part consultant contracted with the City. All costs for review will be forwarded onto the applicant.

- Water Connection: The proposed connection at Mariner's View Court is insufficient. Water is required to be connected from Washington Harbor Loop and extended as a dedicated main of a minimum 12-inch diameter to service the Westbay project. Analysis is to be provided in the Preliminary Water Utility Report. Due to the size and scope of the proposed development, analysis may be necessary to determine if additional infrastructure, such as booster station, looped line alternatives, or additional storage is needed. Please review the City's Water System Plan available at this website: https://www.sequimwa.gov/356/Water In addition, the proposed connection point is to a private water system that does not have the capacity to serve the development as proposed.

- Sanitary Sewer: Preliminary Sewer Utility Report detailing assumptions, flows, preliminary lift station design, lift station discharge, etc. is required.

- Sewer Lift Station: The location of the lift station is proposed to be located within the shoreline jurisdiction and adjacent to the Pitship Pocket Estuary. The Critical Areas Report will need to appropriately evaluate, address and mitigate the proposed location.

- Phasing: Utility phasing should be detailed in the preliminary reports, be appropriately reflected on the site plan and included within the Phasing Plan. Temporary utility looping and mains may be required based construction/phasing plan.

2. Stormwater:
   A Preliminary Stormwater Report was not submitted.
   - A Preliminary Stormwater Report detailing compliance with 2024 Washington State Department of Ecology Stormwater Management Manual for Western Washington (SWMMWW) is required.

3. Traffic:
   The Traffic Impact Analysis (TIA) submitted is insufficient.
   - There is insufficient information to reliably apply reductions to the ITE Manual Trip Generation (i.e. supplemental comparative analysis of the Seabrook community). Trip generation will be to ITE standard to determine LOS.

   - No traffic mitigation is proposed, even with Level of Service (LOS) impacts contributable to the project.

   - LOS detailed in the submitted TIA conflict with the City's LOS specifically for Sequim Avenue/Washington and 3rd/Washington by significant margins; as an example.

   - The TIA must include the West Sequim Bay Road and SR 101 existing and proposed LOS. Coordination with Clallam County will be required. Coordination with WSDOT on the existing and proposed LOS at Whitefeather Way and West Sequim Bay Road intersections will be required.

- Please note that under SEPA, a development project may be required to mitigate traffic impacts to avoid further degradation of an intersection's level of service, even if the intersection operates at LOS F. Identification of improvements to mitigate the impacts of the development project is the responsibility of the applicant.

4. Streets: Frontage and interior right of way improvements are required to comply with the City of Sequim's Engineering Standards.
    - After reviewing the package as submitted, it appears the applicant is looking to develop private streets and rights of way. Please reference Department of Community and Economic Development #6 Master Plan Contents regarding alternative development standards.

    - Whitefeather Way and West Sequim Bay Road are to be developed to the City's Arterial Street standard and to remain public right of way.

    - Interior roads are to be developed to either Local or Neighborhood classification, based upon estimated AADT, to be determined based on trips identified in the TIA.

    - Provide emergency vehicle turn arounds at dead ends; cul-de-sacs, "T" or hammer-head designs consistent with Fire Code requirements, will suffice.

    - Street grades and geometry are to be compliant with either AASTO (Exhibit 6-4) or WSDOT (Chapter 1220) standard guidelines, whichever of the two is more restrictive.

    - ADA compliance is to be maintained to the maximum extent feasible for all rights of way both private and public.

    - Appurtenances including, but not limited to, intersection control, streetlights, roundabouts, traffic calming, parking areas/bays (residential and commercial), etc. need to be identified on the site plan and civil plan set.