



February 19, 2020



Mr. Jeff Wilson, AICP
Director of Community Development
City of DuPont
1700 Civic Drive
DuPont, Washington 98327

**Subject: RESPONSES TO LAND USE PERMIT COMMENTS, DUPONT
PUBLIC WORKS FACILITY – NORTH SITE, PLNG2019-024
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON
G&O #19233.00**

Dear Mr. Wilson:

We are in receipt of the City's comment letter dated January 15, 2020 for the DuPont Public Works Facility – North Site, Site Plan Review, SEPA, Short Plat and Design Review. Our responses to the individual planning department comments are as follows:

1. There are inconsistencies between all submitted plans. Attached are redlines that highlight some of these inconsistencies and required additional information. **Provide one complete and coordinated set of revised plans that address all redline comments.**

One complete and coordinated set of revised plans will be provided.

2. You are requesting a Tree Modification to allow work within the tree protection radius. We have the following comments on the Tree Modification Request:
 - a. Per DMC 25.120.050 this may be allowed based on special circumstances pertaining to the land or the trees on it. Such request shall be addressed, in writing, with full documentation and justification. **Provide an explanation and full justification in writing why the request is needed including the special circumstances.**
 - b. **Clearly identify which trees are to be retained and/or removed on the grading plan and planting plans. Trees that are removed shall be marked with an "X".**



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- c. **Add the Tree Risk Assessment Recommendations as notes to the Grading plan and Planting Plan.**
- d. The Tree Risk Assessment prepared by Sound Urban Forestry (SUF) dated August 13, 2019 identified two trees northeast of the proposed public works building (ID# 14 and 15). It is not clear if these trees will be retained or removed. **If the trees are to be removed, identify the trees as such with an “X” through them on the Grading Plan, Planting Plan, and MO-13 Plan and update the SEPA Checklist as required. Also update the Oak Tree Encroachment report prepared by SUF dated November 20, 2019. If the trees are to be retained, identify the trees as such on the MO-13 exhibit, site plan, landscape plan and grading plan and include the tree protection radius.**
- e. **Provide the location, size, and species of all existing landmark, historic, and specimen trees on the planting plan.**

The MO-13 Oak Preserve boundary depicted on the MO-13 exhibit needs additional information to determine if the remaining oak preserve will be, as described in DMC 25.120.040, one contiguous block that includes the entire western portion, particularly in light of development potential for other property within the MO-13 boundary. **Provide the parcel lines for all property within the MO-13 area and provide an area calculation of the portion of MO-13 boundary that falls within each parcel.** The landscape and irrigation plans do not show the MO-13 boundary. **Provide the MO-13 Oak Preserve Area and on the planting plan and irrigation plan to show compliance with DMC 25.120.040.**

- f. Per DMC 25.12.040 Oak Management Mapping Units, the following standards apply to the project:
 - 1. DMC 25.12.040 (3) Temporary fences shall be placed around oak preserves during construction to avoid disturbance.
 - 2. DMC 25.12.040(4) No cuts, fills, or trenching shall occur in oak preserves. Grading near oak preserves shall utilize natural contours when possible to avoid creating pedestals or bodies where oaks are growing.



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3. DMC 25.12.040(5) Oaks in preserves shall not be irrigated unless an arborist experienced with oaks determines that, due to drought, they need deep watering around the drip line. Oak trees in areas surrounded by impervious surfaces may be more susceptible to drought.
4. DMC 25.12.040(6) Landscaping in oak preserves shall be limited to native shrubs, grasses, or herbs. In Mapping Unit MO-17a's preserves, native understory shrubs such as snowberry may be planted.
5. DMC 25.12.040(9) Oak preserves shall not be mowed except in Mapping Unit MO-17a, and in any oak preserve as necessary for fire control or for Scot's Broom control.
6. DMC 25.12.040 (10) Oaks in preserves shall not be cut, but may be pruned by an arborist experienced with oaks, during the dormant season, to remove dead, weakened, diseased, or dangerous branches.

Per DMC 25.120.040(5), Oaks in preserves shall not be irrigated unless an arborist experienced with oaks determines that, due to drought, they need deep watering around the drip line. The irrigation plan shows irrigation within the drip line of the oak trees. **Revise plans as needed or provide a letter from an arborist stating that the oak trees will not be harmed by irrigation.**

Responses to Comment 2a through 2e are provided under separate cover.

3. We have the following comments on the landscaping/planting plan:
 - a. The landscape area calculation provided on the planting plans does not match the landscape area provided in the October 23, 2019 letter. **Clarify the landscape area calculation and revise plans as needed.**

The Planting Plans will be revised with the current landscape area calculations.



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- b. Provide the tree retention calculations on the planting plan in response to the retention requirements of DMC 25.120.030 Tree Retention.**

The Planting Plans will be revised to include the retention requirements of DMC 25-120.030 and how the proposal meets each requirement.

- c. Provide the interior parking lot landscaping calculations on the planting plan.** Note that DMC 25.90.030 requires one tree per six parking stalls while DMC 25.70.030(3) (g) requires one tree per four parking stalls. The proposal shall be compliant with the more stringent requirement of one tree per four parking stalls.

The Planting Plans will be revised to show one tree per four parking stalls.

- d.** The western property line abuts a zoning district that doesn't allow for office uses. Per DMC 25.90.030(3) (b), the city will require buffers as necessary to mitigate incompatibility. Additionally, the western property line is adjacent to a future street. The proposal shall provide a moderate landscaping buffer along the western property boundary. In your October 23, 2019 letter, you stated that "Additional landscaping screening will be provided along the west side of the site." The planting plan does not describe or indicate a moderate landscaping buffer along the western boundary. Provide a moderate landscaping buffer along the property western boundary as identified in the attached redlines.

The Planting Plans will be revised to identify a moderate landscaping buffer along the western boundary.

- 4.** Per DMC 25.70.020(2) (c) (ii), well-defined pedestrian walkways are required from parking areas, public sidewalks, and building entrances throughout the site. The overall site plan does not appear to be compliant due to the following:
- a.** Lack of well-defined pedestrian walkway between the proposed covered storage building and the proposed public works building.



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- b. Lack of well-defined pedestrian walkway between the proposed public works building and the associated parking for the public works building identified in the parking layout plan.
- c. If the Short Plat Application is withdrawn, then a well-defined pedestrian walkway is required between the public works building and the public safety building.

Clearly identify the pedestrian circulation that is code compliant, or plan to present an explanation of compliance to the Hearing Examiner.

The Site Plan will be revised to identify code compliant pedestrian circulation.

5. Building Setback/Short Plat Comments:

- a. Per DMC 25.70.020(3) (a) “buildings shall generally follow the alignment of the streets they front. However, buildings may be set back up to 15 feet from the front property line when this setback area is to accommodate building entries, outdoor cafes or other pedestrian-oriented activities and use.” The code continues to describe allowances for an additional 10-foot setback for circumstances that do not apply. We interpret this code section as requiring a maximum 15-foot front setback.

Per DMC 25.10.160.110, the front property line is any property line that is adjacent to a street or vehicular access easement or tract more than 21 feet in width. As such, the front property line for this project is the southern property line of the proposed short plat where the access easement provides access. The proposed public works building and storage building are located greater than 15 feet from the front property line. The proposed short plat does not meet the code setback requirements. **There are two potential options:**

1. **Redesign the site plan to meet the front yard setbacks under either the existing property configuration or the proposed short plat configuration, or**
2. **Apply for a variance to the zoning standards. We do not know whether the hearing examiner will approve the variance request; it will be dependent upon whether he determines you meet the criteria for approval.**



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The proposed New Lot 1 of the proposed Short Plat includes a vehicular access easement width of 20 feet. This width is less than the 21-foot requirement, thus New Lot 1 does not have a front property line, nor do the proposed buildings front on a street.

- b. The proposed short plat boundaries are not depicted on the site plan, grading plan or planting plan, and it appears as though there may be some conflicts with the proposed improvements and the property lines, including location of parking. Provide the proposed property lines on the site plan, grading plan and planting plan. Revise the short plat application to include an additional exhibit that depicts the proposed improvements and how the new boundary lines and proposed improvements will be conforming to setback requirements upon recording.

The Site Plan, Grading Plan and Planting Plans will be revised to clearly depict the proposed Short Plat property lines. The Short Plat Drawings will be revised to depict the proposed improvements and to show required setbacks.

6. Design Review Comments:

- a. Per DMC 25.70.020(3) (e), Primary building pedestrian entrances and storefront windows must face onto the primary street not the parking lot. There are building entrances depicted on all four sides of the office building, however the primary entrance appears to be the entrance oriented to the west toward a proposed parking lot. Either revise the primary entrance location to face a primary street (Civic Drive) or be prepared to explain to the hearing examiner how the proposal is compliant.

The proposal does not include frontage on a primary street. Explanation of the compliance of the primary entrance location will be provided.

- b. Per DMC 25.70.070(3) (a), all buildings shall be a minimum of 18-feet. While the land use application states that all buildings will be a minimum height of 20-feet, the fuel station elevation measures approximately 15-feet. Which is correct? Clarify the fuel station height and revise elevations as necessary to meet the minimum height requirement.



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The building height of the Fuel Facility will be a minimum of 18 feet. The current elevations identify the clearance under the canopy as 18 feet.

- c. DMC 25.70.070(6)(b) states that blank walls more than 15 feet in length, and between two feet and eight feet in elevation height without a window, entry, architecture feature, or modulation should not face public open spaces, street rights-of-way, and parking lots. Where such walls are unavoidable, they shall be treated in at least two or more of the ways provided. This provision applies to the portions of the buildings that will be visible to the public rights of way. It appears that the west, east, and south elevations will be visible from Civic Drive. Additional treatments are required for the south and east elevations, see attached redlines for specific areas requiring additional treatments. **Provide a narrative that describes the additional treatments provided and revise elevations.**

A narrative and revised elevations will be provided.

- d. Per DMC 25.70.030(2)(c), all perimeter parking lots shall be edged with a six-inch, cast-in-place concrete curb unless the perimeter landscape buffer is specially designed to direct water runoff to a biofiltration swale. The plans do not depict the curb or indicate use of a biofiltration swale. **Provide curbing or swale details for the west parking area, adjacent to the covered storage building and the east parking areas as necessary to meet this requirement.**

Concrete curb will be added to the plans.

- e. The end of all parking aisles shall have a 6-foot wide planter including a six-inch, cast-in-place concrete curb unless the planter is specially designed to direct water runoff to a biofiltration swale. The west parking area, adjacent to the covered storage building, is missing a six-foot wide planter, and the parking areas west of the public safety building are missing six-foot wide planters in multiple locations. **Update parking areas as necessary.**

Planters with concrete curb will be added to the plans.

- f. Accent colors shall not cover more than 10 percent of any building facade. We did not find an accent color calculations on the plans or elevations. **Provide accent color calculations.**

Accent color calculations will be provided.



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7. SEPA Checklist Comments:

- a. Project Description: Include the above ground fuel tanks and sizes in the project description.

The fuel information has been added in the Revised SEPA Checklist.

- b. Noise: **Provide a Noise Assessment for the South Site. Provide the EDNA Class and allowed dBA within the Noise Study provided for the north site.**

The following noise studies will be provided under separate cover and are referenced in the Revised SEPA Checklist:

- *City of DuPont Public Works Facility, Site Noise Study – North Site, dated February 18, 2020.*
- *City of DuPont Public Works Facility, Site Noise Study – South Site, dated February 18, 2020*

- c. Earth: The SEPA Checklist states that the fill will be balanced (no quantities provided other than gravel) but the re-submittal letter dated Dec. 6 does not provide balanced estimates and only provides estimates for the North Site. **Provide cut/fill quantities in the SEPA Checklist for both the North and South Sites.**

The cut and fill quantities have been added in the Revised SEPA Checklist.

Impervious surface calculations in the SEPA Checklist don't appear correct (15% for North Site and 60% for South Site). The impervious surface calculation should be for the proposed lot configuration. **Confirm or correct impervious surface calculations in the SEPA Checklist.**

Impervious surface calculations have been corrected in the Revised SEPA Checklist.



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- d. The geotechnical report dated April 25, 2019 prepared by PanGEO, Inc. is in “Draft” form. Is there a final report or a Preliminary Report that isn’t Draft? **Provide a Geotechnical Report that is not in Draft form. The geotechnical report also needs to be amended to include a recommended setback from the top of the Landslide Hazard Area, as required per DMC 25.105.050(3) (c) (i).**

An updated Geotechnical Report will be provided.

- e. Water – Section B.3.c.1 describes an existing storm pond to the west of the North Site. Should this be south? **Please confirm/correct reference to the storm pond location for the North Site in the SEPA Checklist.**

The pond location has been corrected in the Revised SEPA Checklist.

- f. Environmental Health – **Provide a description of the proposed aboveground fuel tanks, including size and type of fuel.**

The fuel information has been added in the Revised SEPA Checklist.

- g. Transportation – The checklist states that 30 new parking spaces will be added. The Site plan indicates 33 new spaces will be provided. The provided Parking Exhibit provides a range of 55 – 63 new spaces. **Provide corrections as needed to the Parking Exhibit and SEPA Checklist.**

The new parking space number has been corrected in the Revised SEPA Checklist.

Sincerely,

GRAY & OSBORNE, INC.

Dominic J. Miller, P.E.

DJM/sp

cc: Mr. Gus Lim, P.E., Public Works Director, City of DuPont
Ms. Lisa Klein, AHBL, Inc.