

REVIEW MEMORANDUM

Date: March 7, 2019

To: Richard Berg, Terrapin Architecture
727 Taylor Street
Port Townsend, WA 98368

Celine Santiago, PT Preservation Alliance
3229 Highway 20
Port Townsend, WA 98368

From: Samantha Harper, Assistant City Engineer
John McDonagh, Senior Planner
Lance Bailey, Development Services Director

RE: LUP18-099(PUD) and LUP18-100(SEPA), San Juan Discovery PUD
Request for Additional Information and/or Plan Corrections

The Planned Unit Development (PUD) application for the PT Preservation Alliance located on Discovery Road and San Juan Ave was submitted on December 13, 2018 and deemed a complete application on January 25, 2019. In order to follow up on some questions regarding the permit application, City staff met with the applicant (Celine Santiago), architect (Richard Berg), engineer (Mark Buehrer, by phone) and project manager (Malcolm Dorn, by phone) on Friday, February 22, 2019.

This letter is to provide a written follow up from the Feb. 22 meeting and is organized in two categories:

1. Additional submittals needed; and,
2. Design elements which staff is unable to recommend approval for as originally submitted.

Category 1: Additional submittals needed

1. The Traffic Impact Analysis, Section 3.6 Sight Distance, Page 8 states that the AASHTO standards recommend 240 and 280 feet of unobstructed visibility for right and left turn movements. Per this recommendation a certification is needed from a Civil Engineer that the proposed main entrance on Discovery Road, located across from 29th Street/Alder Street meets ITE/ASHTO standards for sight distance/line of sight requirements ("unobstructed 280 feet"). It is the City's interpretation that the location as it exists does not provide the 280 feet noted on Sheet 12.0 (dated 12/11/18), as the sight line crosses property shown as private and the projected line of sight ends in an incorrect travel lane. While not an additional submittal, the City encourages you to reexamine the main Discovery Road access as proposed and consider relocation to be aligned with the Hastings Avenue intersection.

2. A cross section of the proposed south entrance to Discovery Road is required in order to evaluate the impacts to adjacent properties, fill slopes and the potential need for screening.
3. Provide cross sections of the frontage along Discovery Road in the locations where applicant is proposing sidewalks. The street standard for Discovery Road (EDS T-4 Arterial and Collectors) requires a landscape strip and a 6-foot sidewalk adjacent to the property line (unless topography is a limitation).
4. If the sight distance requirements referenced in #1 above meets the line of sight and the existing retaining wall must be relocated to allow for this line of sight, then a sidewalk along the entire property frontage on Discovery Road will be required. Refer to number 3 above for section detail.
5. Revise and resubmit the Traffic Impact Analysis prepared by Gregory B Heath, Heath & Associates, Inc. dated September 5, 2018.
 - a. Section 3.3 Existing Peak Hour Volumes and travel Patterns (page 6). This section needs supplemental intersection counts provided when school is in session. The intersections where the traffic counts were taken are affected by both Blue Heron Middle School and Salish Coast Elementary School drop off (7:00am – 9:00am) and pick up schedules (Wednesdays 12:00pm – 2:00pm, other days 1:30pm – 3:30pm). The existing traffic counts were conducted in August 2018 and do not accurately represent the existing traffic counts without consideration of the counts when school is in session.
 - b. Section 4.1 Project Trip Generation (page 10), Table 4 and Table 5 are missing land uses. Update Tables 4 and 5 as follows:
 - i. Table 4: Clarify how the total trips are determined. Uses include day care and elder care drop off; carriage house; farm; farm house; estimate of potential trips for live work occupations; boarding house. The Discovery Road count was determined to be 55 SFR units. For the SFR units 4 live/work, 18 cottages and 21 SFR is 43 SFRs and then the 21 SFRs could have ADUs, so maybe 55 is close, but not conservative.
 - ii. Table 5: need to add Café; pub; and art center.
 - iii. Table 5: Please clarify what is meant by 25-percent reduction in the internal link. The commercial road and the residential roadways are not connected, therefore, there appears to be no basis for this reduction.
 - c. Section 4.2 Distribution & Assignment, page 11. The City does not have a capital project to install a roundabout at the intersection of F Street/ San Juan Ave/ Discovery Road budgeted or in the 6-year Transportation Improvement Project (TIP) list, nor are any improvements to San Juan listed in the 6-year CIP.



- d. Update Figures and Table 7 with the updated traffic counts (refer to 5.a) and the updated land use (refer to 5.b).
6. Revise and resubmit the Stormwater Management Report prepared by Mark Buehrer, 2020 Engineering dated December 10, 2018.
 - a. Page 4, Paragraph 2, the City has not adopted the 2014 Stormwater management Manual for Western Washington; we use the 2005 Stormwater Management Manual.
 - b. Page 5, Land Cover & Soils, Paragraph 3 the infiltration range was based on Jefferson County Soils Map with an infiltration rate between 6in/hr. and 20 in/hr. Borings were previously done for an environmental reason for this property and medium coarse sand was found 17-20 feet below the surface, which does not line up with infiltration trenches roughly 4-ft in depth and throughout the proposed project site. Therefore, field exploration and percolation tests at several locations on-site (upper and lower regions) must be made to confirm the assumptions that infiltration is feasible.
 - c. Page 9, MR#5 and Page 10, MR#7, the assumption that this project discharges directly to the Puget Sound is incorrect. This project is located in one of the City's closed depression drainage basins. The stormwater for this project will overflow into the Hastings Pond (wetland) located at the Golf Course adjacent to F Street. This project needs to infiltrate into the sandy soils available at a lower depth on this site (per Geotech report) except for very high rainfall events. The overflow for this project (except for the lower elevations) needs to tie into the existing infiltration system in McNeil Street right-of-way, located on the north side of the proposed project site and Discovery Road. Revise the narrative in the Stormwater Management Report for MR#5 and MR#7 and Plan Sheets reflecting this information.
7. Parking. The comments for the parking are a combination from Sheet 4.0 and the San Juan PUD Project narrative parking section dated December 12, 2018. Re-submit Sheet 4.0 to have Sheet 4.0 match the narrative and indicate the parking count on Sheet 4.0. Some additional comments are
 - a. Northern proposed Cottages indicate 'public parking' shading on Sheet 4.0. This needs to be clarified to describe what is being proposed.
 - b. There does not appear to be adequate parking shown for the commercial and mixed-use uses served from San Juan Ave. Based on the narrative in the December 12th memo and the parking counts in the narrative, parking is needed on both sides of the commercial road serving this area.



- c. Back in angle parking would not appear to be a preferred parking method for this particular application. It also does not give visitors to the proposed commercial area flexibility in on-street parking if a free parking stall becomes available after a car has passes. (i.e. How does this work on one side only for cars leaving the site.)
 - d. There is No parking credit of 2 on-site for the creation of one on-street within the residential zone (i.e. off of Discovery Road).
8. Proposed Lots 12 through 17 and Lot 41 are shown on the Preliminary PUD Plat (Sheet 5.0) as being below the minimum size that can be considered even through the Planned Unit Development (PUD) process (3,000 SF min). Please correct the Preliminary PUD Plat (Sheet 5.0) accordingly and resubmit. As the function of Lot 41 is pedestrian trail, it can be reserved as public easement across the 2 adjoining lots.
9. Each PUD application requires concurrent submittal of an underlying land division application. Please clarify your intention and/or reasoning for submittal of a Binding Site Plan (BSP) application rather than a Full Subdivision for the project. If your intent is to facilitate future condominium ownership by doing a BSP now, that approach only works when it is known how each of the subsequent buildings will be further segregated. Absent sufficient detail on how the subsequent commercial and/or mixed-use structures will be further divided (e.g. converted to condominium ownership), the use of a BSP at this preliminary stage appears premature. A withdrawal of your BSP application and replacement with a Full Subdivision application is strongly encouraged. When you have determined how each of the subsequent buildings will be divided, one or more administrative BSP's (e.g. no public notice or comment period) can be sought.
10. Regardless of the land division type, please clarify which of your submittal documents is intended to represent the preliminary land division application map itself (e.g. the representation of lots, streets, easements, open spaces, etc. that would be recorded with the County Auditor upon final approval). If this is what's intended by Sheet 5.0, please be aware that it should be put into the formatting requirements specified in code (PTMC 18.16 governs even for BSP's).
11. The PUD Narrative includes a summary of specific development standards the project seeks to modify. This summary states that none of the City's prescriptive building setbacks are proposed for modification. It appears that this statement conflicts with other parts of the submittal (e.g. see Sheet 4.0, Building Setback Table; also, the garage/ADU depictions on Lots 26 through 29; and, the barn on Lot 6 – see PTMC 17.16.030 for setbacks normally applied to barns in the R-II zone. A comprehensive written summary of all the modifications being sought by any given PUD is critical for successful application review for several reasons. First and foremost, the modifications sought are often a reflection of the project goals overall. From staff's perspective, an accurate and complete summary of the modifications will ensure the project record is clear, the items sought for adjustment are considered and the final decision documents accurate. The above referenced conflicts in modifications are not intended to be exhaustive. Please



review and revise your submittal concerning all requested PUD modifications as applicable.

12. Nearly every approved PUD in Pt. Townsend has required buffering from adjoining properties to ensure compatibility. The only mention of any buffer staff could find is on Sheet 12 along portions of the south line where landscaping and/or fencing is shown. It is difficult to see how these are reflected on the other submittal Sheets (especially Sheets 4.0 & 5.0). Staff has specific concern over the lack of formal buffers along the entire south line (including the parking area on Lot 40 that would extend within 10' of it) as well as some consideration for 373 Discovery Road. While these are the 2 most obvious areas, the need for other buffers may arise as part of the PUD review process. All proposed PUD buffer areas need to be indicated on the actual land division map (e.g. on the Preliminary PUD Plat (Sheet 5.0). Please revise Sheet 5.0 accordingly.

Category 2: Elements which staff cannot recommend approval for as originally submitted

13. Per EDS Chapter 6 Transportation Section 8 Subdivisions and PUDs – General Layout of the Street and Pathways, page 6-8, discussed guidelines for both pedestrians and bicycle connectivity. The overall proposed development does not appear to meet the criteria laid out in this section regarding how the proposed development meets the internal connectivity and how the internal connectivity connects to the existing City non-motorized network. This affects Sheet 6.0 in the plan set and street and trail cross sections throughout the development (Sheets 7.0 and 7.1). City staff believes there are several additional street frontages where sidewalks are needed, particularly a connecting sidewalk on the south side of the development (e.g. Alley 1 on the north side, Alley 2 on both sides of the street, etc.) and where crossings are needed (e.g. at Discovery Road). Also, it is not clear how bicycles are accommodated through the proposed development.
14. Sheet 6.0, Enhanced pedestrian crossings are required on Discovery Road for access into and out of the development (particularly since there are no sidewalks on the east side of Discovery road south of the project.)
15. All sidewalks (public or private) are required to meet ADA requirements and standards. Sheets 5.0 and 6.0, “Alleys” 1,2,3 are not alleys, but are to be classified as streets.
16. An alley is a secondary means of access; Port Townsend has no alley street standard. The density of housing being proposed most generally matches the City’s T-8 Design standard which includes on-street parking as you have shown for the project. The street type names on Sheet 7 should be used to match the designations on Sheets 5 and 6) (the Key on Sheet 7 shows this, but names on other sheets should match these.)
17. The design standards for sidewalk widths are:
 - Residential = 5ft (T-8)
 - Collector = 6ft (T-4)



- Mixed Use/Commercial = 12ft (T-3)
18. Sheets 6.0, 7.0 and 7.1, for the mixed-use commercial street, the parking width is not wide enough.
 19. Sheet 5.0, any variation to the rights-of-way width in Section 6 transportation Table 6-1 need to be indicated in the list of code modifications requested as a part of the PUD application.
 20. Compare Sheets 5.0, Sheet 9.0, Sheet 10.0 and SWMR Appendix A Exhibit 2:
 - a. Per the EDS General Conditions Section 1.16 Easements, easements for minimum width of 20-ft for single public utility and 25-ft for multiple utilities. When there is a deep utility (i.e. sewer main) the easements may need to be wider. Sheet 5.0 does not meet has public easements which do not meet minimum width standards.
 - b. North side of the proposed development indicates a sewer pump station; ownership of the pump station and if contained within an easement or fee owned property is unclear from the plan sheets.
 21. Proposed Lot 8 is shown on City Critical Area (CA) maps as being encumbered by geologically hazardous slopes (e.g. steep slope/landslide/erosion hazard. This mapped feature, shown on Sheet 2.0, must be evaluated by the applicant's licensed engineering geologist (LEG) to confirm whether a regulated critical area exists here (or not). If not, then a written report from the LEG will suffice for removal of the mapped feature from City maps. If the mapped feature is a regulated critical area, then the creation of Lot 8 is subject to approval through the City's CA code (PTMC 19.05). A formal CA application prepared and submitted as part of the consolidated PUD request is required. Your LEG must identify what minimum buffer must be maintained from the steep slope hazard and whether any special conditions for construction of the proposed Live/Work structure in proximity to it are warranted. If confirmed to be CA, Lot 8 will need to be increased in size (9,825 SF is proposed). 10,000 SF is the minimum size required for lots containing steep slope CA. Please be aware that this minimum size may be increased depending on your LEG's conclusions.
 22. Please clarify the intended ownership structure for the public open space areas (Master Plan, Sheet 4.0) along with any shared private infrastructure including (but not limited to) the stormwater design. Please be aware that the City will not assume ownership and/or maintenance obligations for any of public open space or park areas shown or any stormwater facilities in either Phases 1 or 2 that will lie outside of city rights-of-way. Also, please be advised that formal reservation of any necessary stormwater easements across Phase 2 will be required as part of Phase 1 final approval to ensure a perpetual right to convey the upslope, Phase 1 runoff per the approved design.



23. Please clarify the intended uses that will occur within the ~~bar~~ on Lot 6. If the PUD has plans for keeping of livestock here, a PUD setback reduction (see comment above) may not be appropriate given the adjacent R-II zoning.
24. Several buildings are shown on Sheet 4.0 as extending into one or more of the “public easements” proposed and listed on Sheet 5.0 (Lots 26 through 29; also Lot 18). At least one other building on Sheet 4.0 is shown clearly extending beyond the lot lines it would be built upon (e.g. Lot 8 and the Live/Work building planned there extends onto Lot 43; other Live/Work buildings are shown very close to their respective side property lines – how close are they?). Please elaborate on the purpose of the “landscape easements as shown (Aren’t these more or less utility easements?) and correct the building encroachments shown.

Permit Processing

The city is required to provide a final decision on a development proposal within 120 calendar days from the date of the determination of completeness. The city made an initial determination of completeness on January 25, 2019.

As discussed at the February 22nd meeting, the 120-day review “clock” has been stopped as of that date. The “clock” will proceed upon the earlier of:

- (a) the date the city determines whether the additional information and/or revision of material satisfies the request for information;
- (b) 14 calendar days after the date the information has been provided to the city.

Below are the applicable Port Townsend Municipal Code (PTMC) sections applicable to the tracking of the 120 day development proposal review requirements.

PTMC 20.01.110 Submission and acceptance of application – Determination of completeness – Additional information and project revisions.

F. Additional Information. A project permit application is complete for purposes of this section when it meets the submission requirements in PTMC 20.01.100, as well as the submission requirements contained in the applicable development regulations. This determination of completeness shall be made when the application is sufficient for continued processing even though additional information may be required or project modifications may be undertaken after submittal. The city’s determination of completeness shall not preclude the city from requiring additional information, that the applicant correct plans or perform studies at any time if new information is required for project review, or if there are substantial changes in the proposed action.

- 1. Pursuant to RCW 36.70B.090(1) (a)(i), any period during which the city has requested the applicant to correct plans, perform required studies, or provide additional information shall be excluded from the time period provided in this chapter.*
- 2. The time period for requiring additional information shall be calculated from the date the city notifies the applicant of the need for additional information until the earlier of: (a) the date the city determines whether the information satisfies the request for information; or (b) 14 calendar days after the date the information has been provided to the city.*



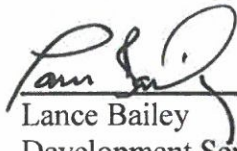
PTMC 20.01.280 Final decision – Exclusions to 120-day deadline.

A. Time. The final decision on a development proposal shall be made within 120 calendar days from the date of the determination of completeness. In determining the number of calendar days that have elapsed after the determination of completeness, the following periods shall be excluded:

2. Pursuant to PTMC 20.01.110(F), any time required to correct plans, perform studies or provide additional information; provided, that within 14 calendar days of receiving the requested additional information, the director shall determine whether the information is adequate to resume the project review.

6. An extension of time mutually agreed upon by the city and the applicant.

Let me know if you have any questions



Lance Bailey
Development Services Director

CC: Files

