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November 20, 2007

Ms. Jennifer Ward
Tacoma Public Works Dept.
747 Market Street, Room 345
Tacoma, WA 98402

Via E-mail (jward@cityoftacoma.org), fax (253-591-5433) & US Mail

**RE: FILE #07-100880-00-IA; SECOND COMMENTS
THE POINT AT NORTHSHORE PRELIMINARY PLAT, VARIANCES, SITE APPROVAL, REZONE
MODIFICATION AND ASSOCIATED SEPA REVIEW, CITY OF TACOMA FILE NUMBERS PLT2007-
40000089069, 40000089068, 40000089065, 40000089067, & 40000089066**

Dear Ms. Ward:

Thank you again for the opportunity to comment on the above-referenced project which is located in close proximity to the City of Federal Way. We understand that the proposed application is for a subdivision totaling 860 dwelling units and the creation of multiple tracts. As revised, the project consists of 366 single-family detached homes and 494 attached zero lot line residential town homes on a 116-acre site currently occupied by the Northshore Golf Course.

We also understand that the applications submitted to the City of Tacoma on January 29, 2007, were determined to be complete and that comments on resubmitted items or requests for additional information shall be provided to your attention on or before noon, November 20, 2007.

We appreciate you providing the following plans and reports for our review:

- Cover memo from City of Tacoma dated November 13, 2007
- Total trip generation summary prepared by TPE NW, LLC dated October 8, 2007
- Landscape studies prepared by Thomas Rengstorf Assoc., undated
- Wetland Map prepared by Apex Engineering dated November 7, 2007
- Wetland site plan prepared by Apex Engineering dated November 9, 2007
- Letter from Northshore Investors, LLC dated November 9, 2007¹
- Environmental Checklist revised date November 6, 2007
- Wetland/Stream Exemption Request to have fully paved buffers prepared by November 9, 2007
- JARPA form signed dated September 18, 2007
- Wetland Assessment prepared by J.S. and Associates dated November 9, 2007
- Reduced scale preliminary plat sheet 1-7 prepared by Apex Engineering revised date 11/06/07
- Color plan of Tacoma with parks identified and traffic calming proposed
- The Point at Northshore: Assessment of Open Space and Density within the Northshore PRD prepared by Apex Engineering, submittal date July 17, 2007

¹ An October 31, 2007, letter to the City of Federal Way from the Northshore Investors, LLC has also been received.

SURFACE WATER DRAINAGE - JOE'S CREEK

The City of Federal Way reviewed the *Conceptual Storm Drainage Report for the Point at Northshore* prepared by Apex Engineering dated October 25, 2007. As previously noted in the City's February 20, 2007 letter, Joe's Creek, which is a salmon spawning creek, flows through City of Federal Way through Twin Lakes (Lake Jeanne and Lake Lorene) and discharges into Puget Sound. The portion of Joe's Creek basin located within Federal Way is subject to Level 2 flow control and resource stream water quality requirements as described in the *1998 King County Surface Water Design Manual (KCSWDM)*. Therefore, Federal Way requests that any proposed water quantity/quality designs outside of Federal Way at a minimum be designed to meet these standards.

The *Conceptual Storm Drainage Report for the Point at Northshore* dated October 25, 2007, appears to show a mixing of incompatible design methodologies. It does not appear that the design for the proposed development will address the runoff duration control as forested conditions for the new development; that the runoff is being blended with off-site runoff and controlled through an SBUH designed pond. The City of Federal Way requests this issue be addressed and/or clarified prior to issuance of the environmental determination and the design requirements are verified.

It is our understanding that Department of Ecology standards will be used for the design of the surface water facilities. However, it is unclear whether a forested condition will be assumed as the predeveloped site condition based on the presumed blending of on-site and off-site runoff. Please provide clarification on the predeveloped site assumptions.

It appears that there is a significant deficiency in the existing Pond B on the project site resulting in erosion, downstream flooding and overflows to Joe's Creek in Federal Way. The conceptual storm drainage analysis utilizes two different storm water analysis techniques in an attempt to arrive at a single design. The SBUH methodology is appropriate for analyzing the existing flooding problem (i.e. the inadequate sizing of Pond B) and for determining what the nature of the repairs/improvements should be based on existing conditions within the basin. The proposed development should then be analyzed using a continuous hydrology model such as WWHM to quantify the improvements needed specific to the development. Since two functionally different designs will come from these two analyses, they cannot simply be combined as it appears was concluded in the conceptual analysis. Please review and clarify the storm water analysis and use of multiple hydrologic models.

The City requests that the environmental determination provide for a mitigation measure showing the City of Federal Way is to review, comment and approve storm drainage plans that impact the headwaters of Joe's Creek, including engineering TESC and final TIR, prior to issuance of any clearing, grading or construction permits, in order to verify and confirm that the proposed development is consistent with adopted stormwater standards. In addition, Federal Way requests that the environmental determination provide a mitigation measure that requires submitting results from on-going water sampling from the northern portion of the project site be forwarded to the Federal Way Surface Water Management Division of Public Works for downstream monitoring purposes.

TRANSPORTATION IMPACTS

1. **Traffic Mitigation Fees** – At the applicant's request, the City of Federal Way prepared a concurrency report dated November 15, 2007, that identified 23 Federal Way Transportation Improvement Plan (TIP) projects impacted by one or more PM peak hour trips resulting in

\$2,877,433 in pro-rata mitigation fees to mitigate the project impacts.² This information must be disclosed in the environmental documents and the fee reflected as mitigation to the City of Federal Way in the threshold determination.

2. **Neighborhood Traffic Safety (NTS)** – Neighborhood safety is of highest priority for the City of Federal Way. This project would increase cut-through traffic onto residential streets, particularly 47th Ave SW (Stonebrook Neighborhood) in Federal Way. Information about these impacts and proposed mitigation measures must be disclosed in the environmental documents along with any appropriate improvements or financial commitments for Federal Way NTS. Further, the applicant must meet with affected neighborhoods and City staff to develop consensus on any proposed calming measures. To minimize cut-through traffic onto the residential streets, the City of Federal Way recommends that the following measures be incorporated prior to issuance of construction permits:
 - A. Design the proposed traffic signal at Northshore Parkway Blvd / 42nd Ave NE intersection to incorporate raised channelization or other similar effective means to prohibit northbound and southbound through traffic on 42nd Ave NE (47th Ave SW in Federal Way) and/or;
 - B. Install traffic calming devices such as speed humps, traffic circles, raised crosswalks, etc. on 47th Ave SW from Northshore Parkway to SW 325th Way.
 - C. Establish a \$30,000 set aside fund to be used for additional traffic calming measures identified in a study and conduct a follow-up study at 75% occupancy of buildable lots or as deemed necessary by the City of Federal Way.

RECREATION AND OPEN SPACE

A similar residential project developed in Federal Way would require that 433,204 square feet of open space be provided for 366 single-family units and 195,200 square feet of open space be provided for 494 multifamily units consisting of 97,600 square feet of private open space and 97,600 square feet of common open space. Total amount of open space required for a project of this size under *Federal Way City Code* (FWCC) would be 628,404 square feet or 14.42 acres.

According to the October 31, 2007, letter from Northshore Investors, LLC the proposed development includes 14.75 acres of HOA owned and maintained open space (both active and passive recreational areas), along with 2.29 miles of pathways and 4.85 miles of sidewalks. The City of Federal Way agrees that the quantity of proposed on-site open space area is consistent with that required under FWCC for a similar project.

The FWCC does require that a minimum of 10% of the gross land area be usable for recreation. The scattered open space parcels proposed with this development may not be conducive to the most effective recreational use or open space value. Also, information provided for our review fails to identify impacts of the new residential development on existing regional systems such as athletic fields and other regional facilities, and fails to identify how it addresses noted recreation deficiencies identified in the Metropolitan Parks Comprehensive Plan (MPCP) Tacoma.

² An electronic copy of the 500+ page document is provided as an attachment to the electronically mailed copy of this letter, and a CD ROM version is attached to the hard copy of this letter. A paper copy will not be sent.

The October 31, 2007, letter from Northshore Investors, LLC, summarizes the following issues from the Strategic Plan:

“The south east portion of the Northeast planning area is not served by community parks. There are two local parks serving this portion of the sub area. Although this area is relatively small, it has also been noted that there is a need for fields, which are a facility often found in community parks. While it is not recommended that MPT acquire or develop another community park to serve this area, some effort should be devoted to expanding the facilities available for organized activities;” and

“The NE planning area is generally well served with local park facilities.”

The applicant states that the identified level of service (LOS) of 9.26 acres/1,000 persons for Tacoma based regional parks is met and exceeded with all the citywide park and regional open grounds offered through their zoological department. While it may be that the LOS for regional parks in Tacoma is met, the residents of NE Tacoma are not easily served by these regional facilities. They may opt for utilizing regional or community park facilities located closer to home, such as those located in King County and Federal Way. As an example, there are no lighted fields in NE Tacoma, and City of Federal Way recreation staff receives repeated requests from NE Tacoma teams seeking to use Federal Way lighted soccer fields. (Federal Way teams use all available slots.)

The lack of regional facilities available to NE Tacoma residents is reflected in the Tacoma Metro Parks Plan which encourages field upgrades at elementary schools to serve this unmet need, “without the level of investment required to develop a community park.” The environmental documents should analyze the increased recreational demand on regional facilities including but not limited to soccer fields located in Federal Way from an expanded NE Tacoma population created by this development and impacts resulting from the new development should be appropriately mitigated.

CLOSING

Thank you again for inviting the City’s comments and providing referenced documentation on this project. We request that the City of Tacoma and/or the applicant address our various concerns and revise as appropriate the preliminary plat application, the SEPA checklist, and associated studies and materials in advance of environmental threshold determination and forward to our attention related, revised documents.

We look forward to reviewing the final environmental documents. Please call Deb Barker, Senior Planner, at 253-835-2642 if you have any questions about this letter or our requests.

Sincerely,



Cary M. Roe, P. E.
Assistant City Manager/Public Works Director

Ms. Ward
November 20, 2007
Page 5

enc: CD Rom of Traffic Concurrency Report copy date November 20, 2007

c: Neal Beets, City Manager
Greg Fewins, Deputy Director of Community Development Services
Ken Miller, Deputy Public Works Director
Rick Perez, Traffic Engineer
Paul Bucich, Surface Water Manager
Will Appleton, Public Works Development Services Manager
Monica Buck, Assistant City Attorney
Linda Farmer, Federal Way Communications Officer
Deb Barker, Senior Planner
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Sarady Long, Traffic Engineer
Kurt Wilson, Northshore Investors, LLC, PO Box 73790, Puyallup, WA 98373
Jeff Schram, Transportation Engineering NW, LLC, 816 6th Street South, Kirkland, WA 98033