



October 28, 2022

Ms. Barbara Kincaid
Public Services Director
City of DuPont
1700 Civic Drive
DuPont, Washington 98327

**SUBJECT: RESPONSE TO PRE-APPLICATION COMMENTS, HOFFMAN HILL CARBON TREATMENT PLANT (PLNG2021-013)
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON
G&O #21235.00**

Dear Ms. Kincaid:

Gray & Osborne, Inc. is in receipt of the following letters with review comments regarding the Hoffman Hill Carbon Treatment Plant Project:

- Hoffman Hill Pre-Application Meeting Comments Letter dated October 12, 2021; and
- Civil Engineering Comments Letter dated September 20, 2021.

Our responses to the individual comments are as follows:

PLANNING COMMENTS

1. Historical Information: According to the Pierce County Assessor, the reservoir was added in 2000, and the pump house in 2013. According to City files, a Conditional Use Permit was approved on Oct. 2, 1997 and the 2002 booster pump station was determined to have been included in the original CUP. The current City zoning codes were adopted in 2002.

Comment acknowledged.

- 2a. Zoning Requirements: The property is located within the Residential 4 zoning district (R4) and is designated by the Comprehensive Plan as being within the Hoffman Hill Village planning area. Permitted Uses in the R4 zoning district are stated in DMC 25.20.030. Per DMC 25.20.030(2),



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above-ground utility and communication structures over 50 square feet in area or 7.5 feet in height are a conditional use. A single 12-foot diameter vessel is approximately 113 square feet in area, and each are 25-feet in height. The six proposed vessels comprise a total of 678 square feet and exceed 7.5 feet in height. Therefore, the proposal will require a conditional use permit. We are continuing to research the permit history and will let you know if our opinion should change.

Conditional Use Permit application will be submitted.

2b. Zoning Requirements: Per DMC 25.20.040, the maximum allowable height is 35-feet, therefore, the tank heights will be compliant. Provide structure height measurement on the conditional use permit and site plan review application materials.

Structure height measurement is noted on the Conditional Use Permit application and the Land Use application Site Plan.

2c. Zoning Requirements: Per DMC 25.20.030(2), the minimum front yard setback is 20 feet. The site plan indicates that the proposed utility facility is setback greater than 40 feet and is code compliant.

Comment acknowledged.

2d. Zoning Requirements: Per DMC 25.20.030(3), the minimum side yard and rear yard setback is 15-feet. Any building wall over 40-feet in height shall be set back at least one additional foot for each foot in height over 40-feet. The side yard and rear yard setback distance is not clear from the provided site plan. Provide side yard and rear yard setback measurements on site plans.

Setback lines are shown on the Land Use application Site Plan

2e. Zoning Requirements: Per DMC 25.20.030(5), the maximum lot coverage is based on lot width. The lot width is assumed to be greater than 60-feet, therefore the maximum lot coverage is 35 percent. Lot coverage is defined in DMC 25.10.030.150 as the percentage of a lot or site covered by buildings or roofed areas, including covered porches and accessory buildings, measured at the building foundation, therefore, the area of the



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tanks shall be included in the lot coverage. The lot coverage calculation shall be provided on the application's site plan.

Lot coverage calculations are included on the Land Use application Site Plan.

2f. Zoning Requirements: Per DMC 25.20.030(6), fence shall not exceed six feet in height, except that the city may, in the conditional use permit process, allow fences up to eight feet tall around utility facility. If any new fences are added indicate the location and height on the site plan.

No fence alterations are proposed.

2g. Zoning Requirements: Per DMC 25.45.030(12), noise levels shall not exceed the maximum allowed in Chapter 9.09 DMC (Sound and Vibration) for Class B (commercial) environmental designations. Provide a water filtration system manufacturer's spec sheet that provides sufficient information to determine compliance with noise requirements.

Since the water filtration systems do not create significant noise when running, the O&M manual from the manufacturer does not address noise. A memo regarding noise is included with the Land Use application.

2h. Zoning Requirements: Per DMC 25.45.030(15), outdoor lighting shall be designed to minimize light escapement beyond the site. If exterior lighting is proposed provide a photometric that ensure compliance with this standard.

No new or revised exterior lighting is proposed.

2i. Zoning Requirements: Per DMC 25.45.040, development projects on site of 15 acres or less and expansions of permitted projects involving 15 acres or less shall be processed as a Type II procedure. The project is a conditional use, however, which requires Type III approval. See Procedural requirements, below.

Comment acknowledged.



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3a. Landscaping Requirements: A conceptual landscape plan will be required with site plan review. It is presumed that disturbed areas will be hydroseeded.

Hydroseeding limits are shown on the on the Land Use application Site Plan.

3b. Landscaping Requirements: A minimum of 30% of the site area must be landscaped per DMC 25.90.020. Provide an approximation of the landscape area on the landscape plan.

Landscaping area calculations are included on the Land Use application Site Plan.

3c. Landscaping Requirements: Per DMC 25.90.030(3)(b), the City may require full, moderate, or light buffers to mitigate incompatibility between residential and nonresidential or other areas. It appears the new carbon filter tanks will be visible from the back yards of several properties that front on Foreman Road and back up to the subject property. It is not clear if providing a buffer could mitigate for the view impacts. Provide a few renderings of the proposal as it will be viewed from Foreman Road. Provide the renderings from parcel 30010622440 and another residential location from the south (looking north).

The requested renderings are included with the Land Use application.

3d. Comment: Water conservation is required. See DMC 25.90.040.

No new irrigation is proposed. The existing irrigation system will be revised and reduced to accommodate the new water treatment facilities.

4a. Off Street Parking Requirements: Not applicable.

Comment acknowledged.

5a. Recycling Requirements: Per DMC 25.100.020(3), the proposed unstaffed facility is exempt from DMC 25.100.

Comment acknowledged.



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6a. Critical Areas Requirements: Per Figure 1 below, the proposed location of the water treatment system could potentially be in slopes greater than 15 percent. A geotechnical report is required to address the presence of landslide hazard areas per DMC 25.105.050(3)(a). If the project site contains a landslide hazard area, the geotechnical report shall review the project against landslide hazard standards and development requirements.

A Geotechnical Report is included with the Land Use application.

6b. Critical Areas Requirements: The subject property is in the breeding area for three bat species that are listed as Priority Species. If any trees are proposed to be removed, they shall be reviewed by a biologist for presence of the Priority Species nesting habitat. If the nesting habitat is found and will be impacted by tree removal, a Habitat Management Plan is required and shall be prepared in compliance with DMC 25.105.050.B.

No tree removal is proposed.

6c. Critical Areas Requirements: Per DMC 25.105.080, a Critical Area Permit will be required if there are unavoidable impacts to Critical Areas (impacts to Priority Habitat or steep slopes). Critical Area Permits are processed as a Type III procedure, which requires approval from the City's Hearing Examiner. A complete critical area development application shall contain the information contained in DMC 25.105.080 and the information required by DMC 25.175.020. Provide a narrative at the time of application that addresses the permit review criteria provided in DMC 25.105.080.D.1. This can be included within the Critical Areas Report.

Comment acknowledged.

7a. Tree Retention Requirements: It appears that the project will place the six carbon treatment vessels in an area that was previously cleared and graded and would not require tree removal. To ensure that the project does not include clearing, grading, trenching, cutting, impervious surface, or other construction within the drip line of any offsite tree, provide all tree driplines adjacent to the proposal's development footprint on the grading plans.



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Pertinent offset tree driplines are shown on the Land Use application Grading Plan.

7b. Tree Retention Requirements: Per DMC 25.130.030(3), one and one-half trees per acre shall be retained overall. The property has numerous trees along the property lines. It is anticipated that the proposal will be compliant with this standard. Provide a calculation of the estimated trees per acre to be retained. Note, the calculation is not required if no trees will be removed or harmed for the proposal.

No tree removal is proposed.

7c. Tree Retention Requirements: If you are unable to meet the tree retention requirements, you may apply for a Type III Tree Modification. You will need to submit full documentation (arborist report and landscape plans) together with justification for the special circumstances pertaining to the land or the trees on it. Type III permits are approved by the City's Hearing Examiner.

Comment acknowledged.

8a. SEPA Environmental Review: Per WAC 197-11-800(23)(b) water facilities, lines, equipment, hookups or appurtenances including, utilizing or related to lines twelve inches or less in diameter are SEPA exempt. If the pipe size should be greater than 12 inches, provide a SEPA Checklist with the CUP application.

A draft SEPA Checklist is included with the Land- Use application.

9a. Other Requirements, Colors: Please submit some renderings with a few color options, including white and green, for staff and public consideration.

The requested renderings are included with the Land Use application.

9b. Other Requirements, Public Notice or Public Meeting: The proposal will include the standard Notice of Application with a 14-day comment period. The City is considering conducting a public meeting to solicit additional neighborhood comments on the proposal. We will let you know when we



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have more information on the meeting, including potential dates and format.

Comment acknowledged.

10.1. Land Use Application Submittal Requirements.

The applicable stated requirements are included in the Land Use application.

CIVIL ENGINEERING COMMENTS

1. Applicant shall demonstrate that the driveway can accommodate all vehicles required for routine maintenance of both the existing water plant facilities and the proposed carbon filters.

The existing access at the site has been shown to accommodate vehicles for maintenance. Proposed water plant facilities are adjacent to areas that have been routinely maintained in the past.

2. Applicant shall meet all stormwater management codes in effect at the time of application for permits. This includes meeting all flow control, water quality, and erosion control requirements, as they apply to the project size and surface characteristics.

A Stormwater Memo is included with the Land Use application.

3. Applicant shall confirm that frontage sidewalks (including the portion crossed by the driveway) meet accessibility requirements, per the ADA and DuPont Municipal Code.

No proposed modifications to sidewalks for this project.

4. Any damage occurring to the City street, driveway, or sidewalk as a result of the project shall be repaired in full compliance with current City standards.

Comment acknowledged.



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5. The project shall comply with any other related City requirements from other departments that apply to the project.

Comment acknowledged.

Please contact me if you have any questions or concerns regarding these comments.

Sincerely,

GRAY & OSBORNE, INC.

Dominic J. Miller, P.E.

DJM/sp

cc: Ms. Lisa Klein, AHBL, Inc.
Mr. Larry Clark, City of DuPont