



DOUGLAS COUNTY

TRANSPORTATION & LAND SERVICES

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STAFF REPORT FEIL SUBDIVISION P-2022-06

TO: Douglas County Hearing Examiner
FROM: Douglas County Land Services Staff
RE: Feil Subdivision (P-2022-06)
DATE: August 17, 2023

GENERAL INFORMATION

Requested Action: An application for a 19 lot major subdivision. The subject property is approximately 3.21 acres in size and located in the Residential Low Density (R-L) zoning district. The proposed lots range in size from .11 acres to .19 acres. The applicant is proposing to utilize EWMC 17.72.045 – *Lot Size Averaging* to achieve the desired lot layout.

Location: The subject property is located east of the intersection of 22nd Street NE and N Ashland Ave in East Wenatchee. The subject property is further described as being located within Section 35, Township 23N, Range 20E, W.M. Douglas County Assessor's parcel number: 40900003716.

SITE INFORMATION

Total Project Size:	3.21
No. of lots	19
Domestic Water:	East Wenatchee Water District
Sewage Disposal:	Douglas County Sewer District
Power/Electricity:	Douglas County PUD
Fire Protection:	Wenatchee Valley Fire Department
Telephone Service:	Varied

Site Characteristics: The subject property is mildly sloped with no existing structures on site.

Uses adjacent to the subject properties:

North: Single family dwellings

South: 22nd St NE/ vacant land

East: Single family dwellings/ Church

West: Single family dwellings

Access: The subdivision will be accessed via 22nd St NE. The proposal includes an internal road system. All roadway improvements will be the responsibility of the developer; and compliant with the East Wenatchee Road Standards and Specifications.

Zoning and Development Standards: The subject property is located within the Residential Low Density (R-L) Zoning District under East Wenatchee Municipal Code (EWMC), which allows for the subdivision of land.

The Growth Management Act identifies that urban growth areas are lands intended for annexation by the adjacent city within 20 years. Based on this, Douglas County has adopted city development regulations within their urban growth areas in order to guide growth according to city standards and ease the transition during future annexations. On March 28, 2007, Douglas County adopted Ordinance 07-01H which adopted sections of Title 17 'Zoning' of the East Wenatchee Municipal Code within the unincorporated portions of the East Wenatchee Urban Growth Boundary.

Major Subdivisions:

The requirements of Title 17, "Subdivisions" Douglas County Code, apply to the design and review requirements for approval of major subdivisions of 10 or more lots, parcels or tracts.

COMPREHENSIVE PLAN:

The Greater East Wenatchee Area Comprehensive Plan designates this property as Residential Low Density. The Low Residential designation is intended to permit a range of housing options and densities to provide areas desirable for single-family residential use. The primary and preferred land use is residential. The use of innovative housing techniques such as attached single family, zero-lot line housing, averaging lots sizes, and other alternates should be encouraged infilling and variety of housing types and densities. In order for these techniques to be used in a manner that protects the integrity of the surrounding properties, there must be mechanisms to ensure neighborhood compatibility and good design quality.

The following goals and policies set forth in the comprehensive plan are relevant to this development:

URBAN GROWTH

POLICY UG-12: The City and County encourage the use of innovative, high quality infill development and redevelopment strategies such as planned developments, zero-lot line, lot-size averaging, shadow platting, small lot subdivisions, and mixed uses in existing developed areas within the urban growth areas.

LAND USE – RESIDENTIAL:

The quality and integrity of residential neighborhoods defines the character of the community. Ensuring that these neighborhoods remain stable and vital is of primary importance to meet the goals of the Growth Management Act, the Land Use Plan, and the Housing Plan.

POLICY: Urban governmental services and infrastructure must be available at the time of development or there must be a plan in place, with funding, to ensure that a full range of urban governmental services is available to serve the development within the planning period.

HOUSING

GOAL: To provide for a sufficient number of safe, attractive and affordable residences for people of all income levels.

GOAL: To provide for a variety of housing types and densities to ensure a range of affordable housing options for all segments of the community.

GOAL: To ensure that public facilities and infrastructure are available to support development at urban densities in advance of / or concurrent with development.

POLICY H-1: Require residential development at urban densities to locate within urban growth areas consistent with the comprehensive plan.

POLICY H-4: Apply consistent standards in residential development to preserve residential character.

POLICY H-6: Require the construction of sound, safe, and sanitary dwelling units.

POLICY H-12: Development standards must address efficient transportation networks and multi-modal opportunities for new development requiring the extension of existing streets into and through developments and the provision of sidewalks and trails for non-motorized modes of transportation.

POLICY H-13: New residential development in the urban growth area must be concurrently served by a full range of urban governmental services.

POLICY H-25: Ensure that new developments provide adequate street illumination.

UTILITIES

GOAL 1: Facilitate the development of all utilities at the appropriate levels of service to accommodate growth that is anticipated to occur in the area, in a fair and timely manner.

POLICY UT 2: A full range of urban services shall be provided within the entire urban growth area by promoting utility extensions to those areas needing urban services.

POLICY UT 3: Encourage development of vacant properties adjacent to established utility systems, according to the appropriate zoning classification and/or land use designation.

POLICY UT 4: Ensure that development take into account the timely provision of adequate and efficient utility systems.

POLICY UT 5: The cost of on-site utility improvements or site preparation for developments, such as surface drainage, utilities, and water and sewer systems should be the responsibility of private enterprise.

POLICY UT 7: Facilitate the provision of urban services to all areas in the urban growth area by sizing and locating new services that will efficiently accommodate future service extensions.

POLICY UT 10: Require the under-grounding of utility wires, where feasible.

GOAL 4: Provide sewer service for the East Wenatchee Urban Growth Area.

GOAL 5: Provide an efficient surface and stormwater management system that serves community residences and business in a manner that makes efficient use of limited resources and minimizes damage to public and private property from flooding events.

POLICY UT 23: Design, construct, and maintain stormwater facilities in a manner that minimizes their impact on adjacent neighborhoods and business.

POLICY UT 25: Require new developments locate required stormwater management facilities on-site unless a regional facility benefiting drainage has been constructed with sufficient excess capacity to serve the development.

POLICY UT 29: Stormwater facilities and infrastructure shall be of a type, nature and location to facilitate ease of access for required inspection, maintenance and operation. Stormwater facilities shall be located on a separate tract, where feasible overflow and access is provided from a county or city right-of-way.

TRANSPORTATION

GOAL: Provide a balanced transportation system that meets the needs of the community by accommodating the movement of people, goods, and services at an optimum level of safety, economy and efficiency.

GOAL: Ensure adequate and safe access to property via a system of public and private roads.

POLICY T-6: As public and private development occurs, ensure that transportation system improvements have adequate streets, sidewalks and walkways; and are consistent with the transportation and adopted system design.

POLICY T-7: Ensure that current and future developments provide proper, adequate and safe access to the transportation system and facilities.

- Provision for adequate parking must be included for all development
- Natural and artificial landscaping should be considered in the design of system facilities

POLICY T-8: Facilitate mobility for all residents within the Greater East Wenatchee Area; including the elderly and persons with disabilities by providing accessible transportation facilities.

POLICY T-16: Design transportation facilities within the Greater East Wenatchee Area that minimize adverse environmental impacts resulting from both their construction and use.

POLICY T-17: Economic and residential growth decisions should be tied to the ability of the existing transportation system to accommodate the increased demand, or new transportation facilities should be provided concurrently with the proposed development.

POLICY T-18: Allow land use changes only when proposals are consistent with the adopted transportation level of service standards of the comprehensive plan.

POLICY T-19: Control the location and spacing of driveways and encourage the development of shared driveways.

POLICY T-23: Institute financing measures for major circulation elements that fairly distribute the cost between private property owners and the public sector.

POLICY T-24: All road construction projects shall be designed and constructed in compliance with locally adopted stormwater management standards.

POLICY T-26: Encourage public transportation-compatible infill development on bypassed vacant parcels in developed areas adjacent to bus routes and stops.

POLICY T-27: All transit related decisions such as roadway access, projects, and pedestrian linkages shall be consistent with the current adopted LINK service area policies.

POLICY T-34: Development shall provide improvements adjacent to their development in accordance with adopted design standards and approved traffic studies. Where deficiencies are present, these issues would have to be addressed prior to development occurring in order to protect the public's health, safety and general welfare consistent with the policies of the comprehensive plan, standard engineering principals, and adopted standards. Improvements necessary to maintain adopted levels of service shall be in place at the time of development, or a financial commitment agreed to by the city or county and the applicant must be in place to complete the improvements or strategies within six years.

POLICY T-40: Encourage physical activity by providing alternative modes of transportation with more pedestrian and bicycle friendly street standards.

ENVIRONMENTAL REVIEW

Douglas County issued a Determination of Non-Significance on 8/1/2022 in accordance with WAC 197-11-355 (Optional DNS).

AGENCY AND PUBLIC COMMENTS:

Applicable agencies have been given the opportunity to review this proposal. Agency comments have been included as an attachment.

Agency comments:

Agency Notified	Response Received	Agency Notified	Response Received
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Chelan-Douglas Health District	1/4/2023	Dept. of Arch. & Historical Preservation	N/R
Douglas County PUD	12/16/2022	Douglas County GIS/Addressing	07/31/2023
WA State Dept. of Ecology	12/22/2022	Douglas County Assessor	N/R
Douglas County Fire District 2	12/9/2022	East Wenatchee Water District	1/10/2023
Douglas County Sewer District	12/8/2022	Douglas County Transportation & Stormwater	7/3/2023
Douglas County Land Services	7/31/2023	Confederated Tribes of the Colville Reservation	12/15/2022
Douglas County Treasurer	12/19/2022	Eastmont School District	12/27/2022
Wenatchee Reclamation Irrigation District	12/08/2022	Douglas County Building Official/ Fire Marshal	8/8/2023

* N/R = No Reply

Agency comments have been included as suggested conditions of approval, as applicable.

Multiple members of the public commented on the proposal. The comments raised concerns regarding existing irrigation lines, loss of views, and loss of property value. The citizens who commented indicate multiple irrigation lines run through the subject property and request that irrigation service not be interrupted.

PROJECT ANALYSIS

In review of this proposal it is important to consider the goals and policies of the comprehensive plan, applicable county code, public and agency comments, any identified environmental concerns and state and federal requirements. Identified below is planning staff's analysis and consistency review for the subject application.

Comprehensive plan consistency:

The proposal is consistent with the goals and policies of the Greater East Wenatchee Area Comprehensive Plan. The proposed lot sizes meet the density standards for residential lots. Policy H-13 requires that urban development within the urban growth area be served concurrently with urban services. The development will be served by the full range of urban services. The first goal of the transportation chapter strives to provide

a balanced transportation system that meets the needs of the community by accommodating the movement of people, goods and services at an optimum level of safety, economy and efficiency. This project will include a balanced transportation system and be consistent with multiple goals and policies of the Greater East Wenatchee Area Comprehensive Plan.

Consistency with the provisions of Title 17, "Subdivision", Douglas County Code.

As conditioned, the proposed subdivision is consistent with the provision of this title.

Consistency with the provisions of the R-L Zoning District, Chapter 17.24, EWMC as adopted by Douglas County:

The subdivision will meet all applicable development standards of the Residential Low Density zoning district including but not limited to minimum lot size, lot width, and lot depth.

As conditioned, the proposal is consistent with the provisions of this chapter.

Consistency with the provisions of Lot Frontage, Section 17.72.210, EWMC as adopted by Douglas County:

Residential lots shall have not less than 40 feet of frontage on a public or private roadway, except when located within a cul-de-sac or when the lot is accessed from a joint-use driveway or access easement meeting the requirements of Chapters 12.50 through 12.60 EWMC, comprehensive street standards, and any amendments. A minimum of 20 feet of contiguous frontage is required for lots located on a cul-de-sac (road right-of-way) and lots located on the outside of a road curve with a radius between 50 and 75 feet.

As applied, the proposal is consistent with the provisions of this chapter.

Consistency with the provisions of Open Space Standards, Chapter 17.73, EWMC, adopted by Douglas County:

RCW 58.17.110 requires that local governments make appropriate provision for the establishment of parks, open space and recreational areas at the time it considers approval of a proposed subdivision. The Greater East Wenatchee Area Comprehensive Plan and EWMC 17.73 establish the level of service and standards in order to mitigate any adverse impacts of new development on neighborhoods without adequate parks, open space and recreational facilities.

The application triggers the requirement to provide parks/open space. Based on project size, the total development area is 139,827 sf. The required open space requirement of 5% is 6,991sf. The applicant has requested to provide a payment in lieu of open space/recreation pursuant to EWMC 17.73.090 - Elective optional payment in lieu of establishing an on-site open space/recreation area. Payment amount/ procedures shall be consistent with EWMC 17.73.090 (B-H). As conditioned, the project is consistent with the provisions of this chapter.

Consistency with the provisions of EWMC 17.73.045 – Lot Size Averaging, adopted by Douglas County

The applicant is proposing to utilize lot size averaging to allow lots smaller than the minimum lot size of 5000 sq. ft. and achieve alternative development standards allowed by code. The following is an analysis of the relevant code section in relation to the project.

EWMC 17.72.045 Lot size averaging.

A. A subdivision or short subdivision will meet the minimum lot area of the zone in which it is located if the area in lots plus critical areas and their buffers and areas designated as open space or recreational uses, if any, divided by the total number of lots equals or exceeds the minimum lot area of the zone in which the property is located. In no case shall the density achieved be greater than the gross site area density permitted within the underlying zoning district.

The total square footage of all lots involved, not including lot 20 which is being proposed as a stormwater facility, is 116,326 sq. ft. $116,326 / 19$ (Total # of residential lots) = 6122 sq. ft. exceeding the minimum lot size of 5000 sq. ft. allowed by the R-L zoning district.

B. This section shall only apply within residential zoning districts.

The subject property is located in the Residential Low Density zoning district.

C. Each single lot shall be at least 3,000 square feet in area.

Each lot exceeds 3000 sq. ft. in area.

D. Lots in subdivisions and short subdivisions created under the provisions of this section shall have a maximum lot coverage of 55 percent.

As conditioned, lots will have the ability to build at a 55% maximum lot coverage.

E. Lots with less than the prescribed minimum lot area for the zone in which they are located shall have a minimum lot width of at least 40 feet, and front yard setbacks of 15 feet except that garages must be set back 18 feet from the right-of-way (with the exception of alleys) and corner lots may reduce one front yard setback to no less than 15 feet.

All lots exceed the minimum width of 40 ft. As conditioned, lots will have the ability to develop at the applicable setback standards.

F. Preliminary subdivisions approved utilizing lot averaging shall not be recorded by divisions unless such divisions individually or together as cumulative, contiguous parcels, satisfy the requirements of this section.

As conditioned, the project will proceed consistent with EWMC 17.72.045

G. Roadways and surface detention/retention facilities shall not count toward the calculations for lot size averaging unless the detention/retention facility is either (1) designed and constructed so as to appear as a natural wetland system, or (2) designed

and constructed in a manner that provides active or passive recreational benefits in a natural or manicured landscaped setting. (Ord. 16-12 § 8, 2017; Ord. 07-05 § 7, 2007)

Lot 20, which is being proposed as a stormwater facility, has not been included in calculations for lot size averaging.

Consistency with the provisions of DCC Chapter 20.34, Stormwater Drainage

As conditioned, the proposal is consistent with the provisions of this chapter.

Consistency with the provisions of DCC Title 12 Road Standards

As conditioned, the proposal is consistent with the provisions of this chapter.

RECOMMENDATION

As conditioned below, this application does not appear to be detrimental to the general public health, safety or welfare and meets the basic intent and criteria associated with Title 17 of the East Wenatchee Municipal Code as adopted in Ordinance # 07-01H, Title 17, 19 and 20 of the Douglas County Code and the Greater East Wenatchee Area Comprehensive Plan. Staff recommends approval of P-2022-06 subject to the following findings of fact and conditions:

Suggested Findings of Fact:

1. The applicant is Dan Feil Holdings, 2115 North Ashlund Ave, East Wenatchee, WA 98802.
2. General Description: An application for a 20 lot major subdivision. The subject property is approximately 3.21 acres in size and located in the Residential Low Density (R-L) zoning district. The proposed lots range in size from .11 acres to .19 acres. The applicant is proposing to utilize EWMC 17.72.045 – Lot Size Averaging to achieve the proposed lot layout.
3. The applicant has submitted the following:
 - Land Use Master Application, dated July 29, 2022.
 - Revised SEPA Checklist, dated April 19, 2023.
 - Revised Preliminary Plat, dated May 11, 2023.
 - Lot Size Averaging Memo, dated July 5, 2023.
 - Payment in Lieu Memo, dated July 5, 2023.
 - Additional Information Response Letter, dated March 10, 2023.
 - Dan Feil Subdivision Preliminary Engineering Drawings dated April 19, 2023.
 - Dan Feil Subdivision Preliminary Stormwater Drainage Report dated July 4, 2022.
 - Feil 22nd Street Preliminary Plat drawings dated April 18, 2023.
 - Letter requesting design alternatives as alternate to code, dated July 5, 2022.
4. Location: The subject property is located east of the intersection of 22nd Street NE and N Ashland Ave in East Wenatchee. The subject property is further described as being located within Section 35, Township 23N, Range 20E, W.M. Douglas County Assessor’s parcel number: 40900003716.
5. Site Information:

Total Project Size:	3.21 acres
No. of lots	19

Domestic Water: East Wenatchee Water District
Sewage Disposal: Douglas County Sewer District
Power/Electricity: Douglas County PUD
Fire Protection: Wenatchee Valley Fire Department
Telephone Service: Varied

6. Site Characteristics: The subject property is mildly sloped with no existing structures on site.
7. Surrounding Property:
North: Single family dwellings
South: 22nd St NE/ vacant land
East: Single family dwellings/ Church
West: Single family dwellings
8. The subject property is located within the East Wenatchee Urban Growth Area.
9. The subject property is designated Residential Low Density by the Greater East Wenatchee Area Comprehensive Plan.
10. The subject property is located in the Residential Low Density (R-L) zoning district which allows for subdivisions as permitted uses.
11. The applicant is proposing to utilize EWMC 17.72.045 – *Lot Size Averaging* to achieve the desired lot layout/ size.
12. A request for an alternate to the East Wenatchee Municipal Code has been proposed by the applicant’s engineer. The alternate to code allows the applicant to:
 - Omit sidewalk along the east side of the private road.
 - Establish a private roadway tract with 40’ width.
13. The preliminary civil plans depict frontage improvements along 22nd Street NE in accordance with pre-application comments provided by the Transportation and Stormwater department. Internal roads are proposed to be private.
14. The preliminary storm report adequately demonstrates stormwater management feasibility for the subject property through the use of qualitative analysis, sub-basin delineation, and calculations.
15. The Washington State Department of Ecology has provided comment indicating a portion of the property lies within an area that was occupied by orchard during the period when lead arsenate was applied as a pesticide, often resulting in shallow soil contamination from lead and/or arsenic. Ecology requires soil sampling if vacant, commercial, industrial, or agricultural properties are converted to residential use as there may be an increased risk of exposure to soil with elevated concentrations of arsenic and lead.
16. The Colville Confederate Tribes (CCT) submitted comments recommending the applicant conduct a Cultural Resource Survey of the property. Per CCT, a statewide predictive model indicates that there is a high probability of encountering cultural resources within the proposed project area. Further, the scale of the proposed ground disturbing actions would destroy any archaeological resources present.
17. The application triggers the requirement to provide open space/ recreation. The applicant has elected to provide a payment in lieu of open space/ recreation pursuant to EWMC 17.73.090 - *Elective optional payment in lieu of establishing an on-site open space/recreation area*.
18. Douglas County issued a Determination of Non-Significance on 08/01/2023 in accordance with WAC 197-11-355 (Optional DNS).

19. On March 28, 2007, Douglas County adopted Ordinance No. 07-01H which adopted portions of Title 17 of the East Wenatchee Municipal Code within the unincorporated portions of the East Wenatchee Urban Growth Area.
20. EWMC 17.72.210 requires residential lots to have not less than 40 feet of frontage on a public or private roadway, except when located within a cul-de-sac, or when the lot is accessed from a joint-use driveway or access easement meeting the requirements of Chapters 12.50 through 12.60 EWMC.
21. Surrounding property owners were given the opportunity to comment on the proposals, can request a copy of the decision, and can appeal the decision subject to the requirements outlined in EWC 19.07.
22. Multiple members of the public commented on the proposal. The comments raised concerns regarding impacts to existing irrigation lines, loss of views, and loss of property value.
23. Proper legal requirements were met and surrounding property owners were given the opportunity to comment on the proposal at a public hearing.
24. Purveyors who responded to the project have indicated that adequate utilities/services are or can serve this project.
25. As conditioned, the development will not adversely affect the general public, health, safety and general welfare.

Suggested Conclusions:

1. As conditioned, the development meets the goals, policies and implementation recommendations as set forth in the Greater East Wenatchee area Comprehensive Plan.
2. As conditioned, this proposal is consistent with applicable federal and state laws and regulations.
3. Public use and interests will be served by approval of this proposal.
4. As conditioned, the proposal is consistent with Title 17 Zoning of the East Wenatchee Municipal Code as adopted by Ordinance # 07-01H.
5. As conditioned, the proposal is consistent with Title 17 "Subdivision", Title 19 "Environment", and Title 20 "Development Standards", of the Douglas County Code.

Suggested Conditions of Approval:

1. The project shall proceed in substantial conformance with the plans and application materials of file except as amended by the conditions herein.
2. The applicant is responsible for compliance with all applicable local, state and federal rules and regulations, and must obtain all appropriate permits and approvals.
3. A plat certificate showing parties of interest from a title company must be submitted with the blueline drawings.
4. The final plat shall be submitted by a land surveyor licensed in the State of Washington, and shall comply with the standards set forth in Title 17 of the Douglas County Code.
5. All parties having an ownership interest in the subject property shall acknowledge the plat.
6. It is the responsibility of the applicant to contact the Douglas County Assessor's and Treasurer's offices to confirm all taxes are current prior to final plat approval.
7. During construction, all work associated with the proposed project shall occur between the hours of 6:00 a.m. to 7:00 p.m., Monday through Friday and 7:00 a.m.

to 7:00 p.m., Saturday. Construction activities on Sunday shall not commence before 8:00 a.m. and shall conclude by 7:00 p.m.

8. The final plat shall show the location of all easements serving or encumbering the subject property.
9. The applicant shall provide the payment in lieu of open space/ recreation in accordance with EWMC 17.73.090. The applicant shall submit calculations of the payment amount, in accordance with EWMC 17.73.090(C) with the final plat for review. Per EWMC 17.73.090 (B), the payment provisions shall be formalized in an agreement that will be recorded with the Douglas County auditor.
10. Per EWMC 17.72.045(D), lots created through lot size averaging shall have the ability to develop at 55% maximum lot coverage.
11. Per EWMC 17.72.045(E), Lots with less than the prescribed minimum lot area for the zone in which they are located shall have a minimum lot width of at least 40 feet, and front yard setbacks of 15 feet except that garages must be set back 18 feet from the right-of-way/ access easement and corner lots may reduce one front yard setback to no less than 15 feet.
12. Domestic water service shall be by expansion of the East Wenatchee Water District's public water system. Written confirmation from the utility agreeing to provide individual service to each lot is required prior to final plat approval. All water system improvements shall be designed, constructed, and placed in accordance with the purveyor's requirements. Completion of the improvements, including necessary easements, must be accepted in writing from the utility prior to final plat approval.
13. The dedicatory language on the plat shall carry the following note:
 - The Health District has not reviewed the legal availability of water to this development.
14. Sanitary sewer service shall be by expansion of the Douglas County Sewer District's public sewer system. Written confirmation from the utility agreeing to provide individual service to each lot is required prior to final plat approval. All sewer system improvements shall be designed, constructed, and placed in accordance with the purveyor's, and the Department of Ecology's, standards and requirements. Completion of the improvements, including necessary easements, must be accepted in writing from the utility prior to final plat approval.
15. The applicant shall provide a payment to provide service to the Douglas County PUD prior to final plat approval.
16. Requirements for fire flow shall meet the standards of the Douglas County Fire Marshal and all required improvements shall be per current District design standards and specifications.
17. The developer will assume all the Water District's costs for the proposal including inspections, testing and permits. After construction is completed and accepted by the Water District, a 2-year maintenance/ warranty bond will be required.
18. An extension of public sewer will be required to serve the subdivision. The developer shall initiate a Developer Extension Application/Agreement (DEA) with the Douglas County Sewer District.
19. All sewer improvements must be constructed and accepted by the Sewer District, or a Performance Bond for 125% of the total value of all sewer improvements must be provided to the Sewer District, prior to final plat approval.
20. Prior to final approval of this development, applicant must obtain a release from Wenatchee Reclamation District which states that irrigation shares have been segregated.

21. RCW 58.17.310 prohibits any city, town or county from approving a short plat or final plat for property in the Irrigation District unless the entity has provided an irrigation water right-of-way for each parcel of land. Rights-of-way must be shown on the plat submitted for final approval.
22. Final construction plans designed by a Professional Engineer licensed in the State of Washington shall be submitted to and accepted by Douglas County prior to construction. Construction plans shall be prepared in accordance with the requirements of the East Wenatchee Municipal Code and Douglas County Code.
23. Include the designation "P-2022-06" on each sheet of the final civil construction plans.
24. Frontage improvements are required along 22nd Street NE in accordance with Figure 3-7b (Urban Local Access) of Douglas County code. 22nd Street NE shall be built to a half-street standard (i.e. 24' wide, curb, gutter, and sidewalk) from the intersection of North Ashland Avenue to the intersection of North Baker Avenue. The portion of the road heading west to the intersection of North Ashland Avenue can be constructed without sidewalk in order to fit within existing right of way and 24' wide (minimum) paved travel way.
25. Internal private roads shall be constructed to meet the roadway section presented on Figure 3-7a of the Douglas County Road Standards, with the exception that the applicant is allowed to omit sidewalk on the east side and utilize a tract width of 40 feet. The construction plans shall show no parking signs along the east side of the private drive and within the cul-de-sac.
26. The access easements for Lots 2, 6, 7, 8, and 14 shall be of sufficient width to include the proposed retaining walls required for the driveways.
27. EWMC requires provision of snow storage in sections 12.53.010.C.3.J and 17.72.010.C.13. The snow storage area shall be a paved 20' by 30' area located in a manner that a snow plow can use it. Douglas County road crews have informed staff that locating the storage areas in general alignment with the road at the end of the cul-de-sac is the best location. Understanding the snow plowing will not be by County crews it is anticipated plowing will be completed in a similar manner to provide sufficient space as necessary to maintain access for large vehicles.
28. Illumination shall be designed and installed consistent with East Wenatchee Municipal Code, Douglas County Code Section 12.57.100 Roadway Illumination, and meet Douglas County PUD Standards. The applicant shall be responsible for PUD charges for the connection of street lights to the transformer or hand hole. The type of light fixture to be installed within the public right of way shall be coordinated with Douglas County during construction plan review. In lieu of a street light at the end of the cul-de-sac, permanent driveway pedestal lighting provided by all lots accessing the cul-de-sac may be substituted; provided, that it is noted on the face of the plat.
29. The location of any cluster mailbox units proposed for the subdivision shall be shown on the construction plans. The location shall be accepted by the County Engineer and USPS Postmaster prior to plan acceptance. Cluster mailbox units shall be located within the public right of way or covered within an easement dedicated for such use.
30. Five-foot utility easements (min.) are required along all lots or tracts with County road frontage in accordance with applicable road standards. Utility purveyors may require easements in excess of five feet.
31. All existing and proposed easements shall be clearly delineated with the Auditor's File Number(s) noted as necessary on the final plat.

32. A Private Access Operation and Maintenance Agreement shall be prepared, executed, and recorded by the applicant; the Auditor's File Number(s) shall be noted on the final plat map.
33. Prior to final plat acceptance and/or release of financial security, the Engineer of Record shall provide written certification that the frontage improvements, off-site improvements, internal roads, utility infrastructure, stormwater systems, and grading have been constructed/completed in accordance with the Conditions of Approval, applicable codes, and the accepted construction plans. Monitoring shall be required as determined appropriate by the Engineer of Record and in accordance with the Road Standards, with final reports submitted to Douglas County along with the certification.
34. Final acceptance shall be processed in accordance with Douglas County Code (DCC) Section 12.56.110 Final Acceptance and prior to final plat acceptance a Warranty Assurance Agreement shall be completed per DCC 12.50.110.
35. Per DCC Chapter 12.24, all new or revised accesses onto a County road (including temporary accesses) require an approved access permit.
36. Utility installation/replacement/upgrade within the Douglas County right-of-way shall be approved by Douglas County. A permit to perform work in the right-of-way shall be obtained prior to construction. Damage to existing roads resulting from construction activities (including utility extensions required to provide necessary services to the proposed development) shall be repaired to the satisfaction of Douglas County, by the applicant. The extent of repair and/or replacement will be determined during construction plan review and during field inspection of the proposed work within the right-of-way.
37. A final site-specific stormwater plan and report prepared by a Professional Engineer licensed in the State of Washington that conforms to Douglas County Code and the 2019 Stormwater Management Manual for Eastern Washington (SWMMEW) shall be submitted to and accepted by Douglas County prior to construction. Final construction plans shall include proposed grading of lots and locations of walls (as applicable).
38. Include the designation "P-2022-06" on the cover sheet of the final stormwater report.
39. Stormwater facilities shall be designed to overflow to the public Right of Way or oversized by 125% of design capacity plus one-foot of freeboard. The volume used to determine that the system meets 125% of design capacity cannot include volume provided by the one-foot of freeboard. A downstream analysis of potential overflow impacts shall be included within the design report.
40. Stormwater facilities shall be located on a separate tract(s) under the functional control of the Homeowners' Association with each lot having an undivided ownership, interest, and responsibility for the tract(s). The final plat shall identify the stormwater tract as tract A, consistent with the civil plans and show easements for drain lines crossing lots.
41. Provisions to provide access for inspection and maintenance of the stormwater tract(s) shall be addressed within the design plans and stormwater report.
42. Prior to any on-site grading occurring or prior to construction plan acceptance (whichever comes first), a Stormwater Pollution Prevention Plan (SWPPP) and a Temporary Erosion and Sediment Control Plan (TESC Plan) shall be submitted to and accepted by Douglas County. The SWPPP and TESC Plan shall be kept on-site at all times and updated as necessary to address and prevent sediment and sediment laden water from leaving the project site.

43. The applicant is responsible for preventing mud, dirt, debris, and stormwater runoff from being tracked or otherwise discharging onto the public Right of Way or adjacent properties.
44. As applicable, registration of facilities that are regulated under the Washington State Department of Ecology's Underground Injection Control Program shall be completed prior to construction.
45. The Engineer of Record shall monitor construction and shall provide as-built drawings and report as necessary along with certification that the improvements have been completed in accordance with the applicable codes, regulations, and accepted plans. UIC registration shall be provided as applicable.
46. Prior to final plat acceptance, a Private Stormwater Operation and Maintenance Agreement shall be executed on standard Douglas County forms. The site plan, details, certification, and operation and maintenance recommendations are provided to the County. County staff then prepares the agreement for signature and recording by the applicant. A note shall be included on the face of the final plat which states:
 - "Douglas County will not maintain the private stormwater facilities located within this subdivision. Responsibility for the long term maintenance of the private stormwater facilities is described within the Declaration of Stormwater System Maintenance Covenants recorded under AFN _____."
47. Roof drains shall be connected to the proposed storm drainage conveyance system along the public and private roads or the lot shall be managed by a lot-specific stormwater system.
48. Any proposed lots which include an on-site infiltration facility will require an engineered construction plan and stormwater report be submitted with the application for a building permit. As applicable, a note shall be included on the face of the final plat which states:
 - "At the time of building permit submittal for Lots __ - __, an engineered construction plan and stormwater report shall be submitted that conforms to Douglas County Code and the current edition of the Stormwater Management Manual for Eastern Washington. The Engineer of Record shall provide certification that the private on-site stormwater system has been completed in accordance with the accepted plans. A private stormwater operation and maintenance agreement, prepared with standard Douglas County forms, shall be executed and recorded with the Douglas County Auditor prior to occupancy."
49. Stormwater stubs may be provided to each of the lots which will drain to the facilities on Tract A. As applicable, a note shall be included on the face of the final plat which states:
 - "At the time of building permit submittal for Lots __ - __, a drainage construction plan shall be submitted which depicts the on-site stormwater conveyance system. The site plan shall include the following information:
 - a. Pipe size.
 - b. Minimum pipe slope.
 - c. Invert elevation at the connection to the stormwater stub.
 - d. Finished floor elevation of the structure and garage slab."
50. Individual lots created within this development are subject to the Douglas County Stormwater Utility annual service charge. This charge is per parcel and is triggered at the time of building permit issuance.

51. Individual/common plan development for this proposal exceeds 1-acre of disturbed ground. This would meet the threshold by the Washington State Department of Ecology (WSDOE) in administering their general permit to discharge stormwater associated with construction activity. The applicant is responsible for acquisition of all applicable permits prior to beginning ground breaking activities, including but not limited to: Construction Stormwater General Permit, Sand & Gravel Stormwater General Permit, and/or Industrial Stormwater General Permit. Compliance with the Washington State Department of Ecology's regulations is the responsibility of the applicant.
52. Minimum Required Fire Flow is 1000 GPM at a minimum of 20 PSI for no less than a 2-Hour duration. A hydrant must be located no more than 250 feet from the nearest frontage access to each lot. Maximum hydrant spacing is 500 feet and as approved or required by the Fire Marshal. The large-diameter port of all hydrants must be equipped with a 4-inch diameter Storz quarter-turn fitting. The Storz fitting must meet the specified requirements of the Fire District as per the discretion of the Fire Marshal. Hydrant shall be required on 22nd street at new development.
53. All access longer than 150 feet must end in an approved Turn Around. Flag lot access poles shall be included in the access length. Turn Arouns must not be a part of a garage approach, must not counted as parking, must not be counted as a storage area, must account for seasonal snow accumulation, and must be capable of supporting the weight of emergency apparatus in all weather conditions.
54. Maximum grade for any graveled access is 10%. Grades greater than 10% but not greater than 12% must be paved. Grades beyond 12% are typically not allowed unless approved by the Fire Marshal on a case-by-case basis.
55. Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet exclusive of shoulders.

Respectfully Submitted,



Tanner Ackley – Principal Planner
Douglas County Land Services

Attachments: Agency and Public Comments



Chelan-Douglas Health District

200 Valley Mall Parkway, East Wenatchee, WA 98802

To: Annette Jester, Douglas County TLS
From: Brian Dickey, RS
Date: 12/19/22
Re: Dan Feil (P2022-06) referral comments

I have reviewed the above development proposal to create 20 lots from existing parcel 40900003716, and recommend approval with the following conditions:

Expanding, Municipal Public Water Systems

- Domestic water service shall be by expansion of the **East Wenatchee Water District's** public water system. Written confirmation from the utility agreeing to provide individual service to each lot is required. All water system improvements must be designed, constructed, and placed in accordance with the purveyor's requirements. Completion of the improvements, including necessary easements, must be accepted in writing from the utility prior to final plat approval.

The dedicatory language on the plat shall carry this note:

"The Health District has not reviewed the legal availability of water to this development."

Expansion of an existing Sewer District services

- Sanitary sewer service shall be by the expansion of the **Douglas County Sewer District's** public sewer system. Written confirmation from the utility agreeing to provide individual service to each lot is required. All sewer system improvements must be designed, constructed, and placed with the purveyor's and the Dept. of Ecology's standards and requirements. Completion of the improvements, including necessary easements, must be accepted in writing from the utility prior to final plat approval.

Additional Information:

Fees for review of land-use applications have been established by the Chelan-Douglas Health District Board of Health. The District will bill the applicant upon receipt of these comments.

Project	CDHD 2022 fees
Plat Pre-Application Review (flat fee)	\$53
Short Plat Referral: <5 lots review (\$113 for 1 st half hour then \$91/hr after that)	\$113 min
Major Plat Referral: PDs, BSPs, etc. with on-site sewage systems, up to 20 lots + Per lot beyond 20	\$619 \$35
Public Water System (new or expansion)	call

These and additional forms, applications, and information can be found from the Chelan-Douglas Health District website at <http://www.cdhd.wa.gov/FormsandDocuments.htm>

- “Subdivisions and the Health District”
- “Private Water Systems”
- “Site Evaluation Application”

Note Detail



Type: Permit Workflow Step

Id: COMMENTS-DC PUD

Note Type:* APPROVAL COMMENTS

Note Code:

Text:* Payment to provide service to the proposal must be received prior to final approval.

Begin Date:* 12/16/2022

End Date:

Link: [Goto](#)

Publish on Portal - Private: **Public:**

Attachments

[Select Files](#)

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Begin

End

Created By

Attachments

be received prior to final approval. 12/16/2022

DDAY@co.douglas.wa.us



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

December 22, 2022

Annette Jester
Douglas County Transportation and Land Services
140 19th Street NW, Suite A
East Wenatchee, WA 98802

Re: 202206106, P-2022-06

Dear Annette Jester:

Thank you for the opportunity to comment during the Optional Determination of Non-Significance process for the Dan Feil Holdings LLC Subdivision. We have reviewed the documents and have the following comments.

TOXIC CLEAN-UP

Thank you for the opportunity to comment on your proposed project.

Historical aerial photos indicate a portion of the properties within the footprint of your proposed changes were occupied by orchard during the period when lead arsenate was applied as a pesticide, often resulting in shallow soil contamination from lead and/or arsenic. Ecology requires soil sampling if vacant, commercial, industrial, or agricultural properties are converted to residential use as there may be an increased risk of exposure to soil with elevated concentrations of arsenic and lead.

Ecology can provide sampling services at no cost. If sampling indicates elevated levels of lead and arsenic, cleanup will be required prior to occupancy. There are simple steps that can be taken to reduce exposure to the public and Ecology can provide free technical assistance.

Additionally, Ecology uses Model Remedies to guide cleanup for lead and arsenic pesticide contamination in historical orchards of Central Washington. The Model Remedy document is an excellent source of technical guidance, and is available at <https://apps.ecology.wa.gov/publications/SummaryPages/2109007.html>.

Page 2
Annette Jester
December 22, 2022

Compliance with a Model Remedy ensures your project meets the minimum standards of the Model Toxics Control Act, and if implemented as described, your property will be successfully cleaned up to Washington State standards.

Additional information, including precautions you can take to reduce exposure, is available at: <https://ecology.wa.gov/dirtalert>

Please contact Hector Casique, Project Manager, at (509) 208-1288 or email hector.casique@ecy.wa.gov, for further information or to schedule your initial sampling.

Sincerely,

Tricia Sawyer

Tricia Sawyer on behalf of Lucila Cornejo, SEPA Coordinator
Central Regional Office
(509)575-2490
crosepacoordinator@ecy.wa.gov

Note Detail



Type: Permit Workflow Step

Id: COMMENTS-DC TREASURER

Note Type:* GENERAL

Note Code:

Good Morning, Property taxes are paid in full on parcel 40900003716 through the 2022 year. This is subject to change if the document is submitted after Jan, 1 2023 due to taxes being certified for 2023. Please feel free to contact me if you have any additional questions or concerns. Thank you, have a wonderful day.

Text:* Carlee Murphy Deputy Treasurer Receptionist Office Assistant III Direct Line : 509-888-6428 Phone : 509-745-8525 Fax : 509-745-8412 Email: cmurphy@co.douglas.wa.us P.O. Box 609 203 S. Rainier Ave. Waterville, WA 98858 The opinions expressed here are my own and do not necessarily represent those of Douglas County.

Begin Date:* 12/19/2022

End Date:

Link: [Goto](#)

Publish on Portal - Private: **Public:**

Attachments

[Select Files](#)

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Created By

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Minimum Required Fire Flow is 1000 GPM at a minimum of 20 PSI for no less than a 2-Hour duration. A hydrant must be located no more than 250 feet from the nearest frontage access to each lot. Maximum hydrant spacing is 500 feet and as approved or required by the Fire Marshal. The large-diameter port of all hydrants must be equipped with a 4-inch diameter Storz quarter-turn fitting. The Storz fitting must meet the specified requirements of the Fire District as per the discretion of the Fire Marshal. Hydrant shall be required on 22nd street at new development.

All access longer than 150 feet must end in an approved Turn Around. Flag lot access poles shall be included in the access length. Turn Arounds must not be a part of a garage approach, must not be counted as parking, must not be counted as a storage area, must account for seasonal snow accumulation, and must be capable of supporting the weight of emergency apparatus in all weather conditions.

Maximum grade for any graveled access is 10%. Grades greater than 10% but not greater than 12% must be paved. Grades beyond 12% are typically not allowed unless approved by the Fire Marshal on a case-by-case basis.

Where a fire hydrant is located on a fire apparatus access road, the minimum road width shall be 26 feet exclusive of shoulders.



COMMISSIONERS:

Terry Barnes
Nick Warner
Tracy Petersen

Vince Johnston, Manager

East Wenatchee Water District

(509) 884-3569 • Fax (509) 886-0550 • 692 Eastmont Avenue • East Wenatchee, WA 98802

January 10, 2023

Douglas County Transportation & Land Services

RE: Dan Feil 19 Lot Subdivision
P-2022-06

Attention: Douglas County AICP,

Water is available per this request. A DEA (developer line extension agreement) has been set up between the Developer and the East Wenatchee Water District. Requirements for fire flow will meet the standards of the Douglas County Fire Marshall and all required improvements will be per current District Design Standards and Specifications.

The Developer will assume all the District's costs for this proposal including inspections, testing and permits. After construction is completed and accepted by the District, a 2-year Maintenance/Warranty Bond will be required.

Thank You,

Colby Thorpe
East Wenatchee Water District
692 Eastmont Ave.
East Wenatchee, WA 98802
509 884-3569

DOUGLAS COUNTY SEWER DISTRICT NO. 1

692 Eastmont Avenue

East Wenatchee, WA 98802

(509) 884-2484 ♦ Fax (509) 884-8091

December 8, 2022

Douglas County Transportation & Land Services

RE: P-2022-06 Feil subdivision, 20 lots

Developer: Dan Feil Holdings, LLC

Application Comments:

Public sewer is available at this time. An extension of public sewer will be required to serve the subdivision, and the developer will need to initiate a Developer Extension Application/Agreement (DEA) with the Sewer District.

All sewer improvements must be constructed and accepted by the Sewer District, or a Performance Bond for 125% of the total value of all sewer improvements must be provided to the Sewer District, prior to final plat approval.

Thank you,

Kurt Hosman

Douglas County Sewer District No. 1

692 Eastmont Ave

East Wenatchee, WA 98802

509-884-2484

Note:

All information provided related to existing public sewer infrastructure is for general reference only. The District does not guarantee the accuracy of the material contained herein and is not responsible for its use. The District assumes no liability for damages or costs incurred by the user of this information. The user must independently verify all locations, elevations and condition of sewer infrastructure during the design phase of any project that involves a connection to, modification of, and/or extension of public sewer.

Note Detail



Type: Permit Workflow Step

Id: COMMENTS-COLVILLE

Note Type:* GENERAL

Note Code:

Text:*

Good Afternoon- We have completed our review of application P-2022-06 for the proposed development of a 20 lot major subdivision by Dan Feil Holdings LLC. The proposed project lies within the traditional territory of the npqaw sx (people in between) or psquosa or Wenatchi Tribe, one of the 12 constituent tribes of the Confederated Tribes of the Colville Reservation (CTCR), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CTCR with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus territory in Idaho, and south-central British Columbia. We concur with the project location as presented. As the proposed project falls within high probability for the potential presence of cultural resources according to the Washington State Department of Archaeology and Historic Preservations (DAHP) statewide predictive model, we recommend the project area be surveyed by a professional archaeologist prior to any ground disturbing activities occurring. If a survey is undertaken, we would like to request a copy of the resulting survey report for our review and comment. Thank you for consulting with the Confederated Tribes of the Colville Reservation. These comments are based on the information as currently presented. We reserve the right to revise our comments as additional information becomes available. If you have any questions, please contact me at the number below. Lamlamt (Thank you),
Rebecca L. Gordon MA, RPA Archaeologist Senior

Begin Date:* 12/15/2022

End Date:

Link:

[Goto](#)

Publish on Portal - Private: **Public:**

Attachments

December 8, 2022

Douglas County Transportation and Land Services
140 19th Street NW, Suite A
East Wenatchee WA 98802

Re: P-2022-06
Dan Feil 20--Lot Subdivision
Parcel # 409 000 037 16

Wenatchee Reclamation District is unable to attend the Pre-Application meeting. Please consider the following comments:

- Prior to final approval of this development, applicant must obtain a release from Wenatchee Reclamation District which states that irrigation shares have been segregated.
- RCW 58.17.310 prohibits any city, town or county from approving a short plat or final plat for property in the District unless the entity has provided an irrigation water right-of-way for each parcel of land. Rights-of-way must be shown on the plat submitted for final approval.

Sincerely,

A handwritten signature in blue ink that reads "Alice M. Meyer". The signature is written in a cursive, flowing style.

Alice M. Meyer
Secretary

**DOUGLAS COUNTY
TRANSPORTATION & LAND SERVICES**



MEMO

DATE: July 3, 2023
TO: Tanner Ackley
FROM: Jordan Brown and Mike Neer
RE: P-2022-06 – Dan Feil Subdivision
Preliminary Approval
Transportation & Stormwater Comments

Suggested Findings of Fact:

1. Initial application materials reviewed by Douglas County Transportation and Stormwater include:
 - Dan Feil Subdivision Preliminary Engineering Drawings dated April 19, 2023.
 - Dan Feil Subdivision Preliminary Stormwater Drainage Report dated July 4, 2022.
 - Feil 22nd Street Preliminary Plat drawings dated April 18, 2023.
 - Letter requesting design alternatives as alternate to code, dated July 5, 2022.
2. A request for an alternate to the East Wenatchee Municipal Code has been proposed by the applicant's engineer. The alternate to code allows the applicant to:
 - Omit sidewalk along the east side of the private road.
 - Establish a private roadway tract with 40' width.
3. The preliminary civil plans depict frontage improvements along 22nd Street NE in accordance with pre-application comments provided by the Transportation and Stormwater department. Internal roads are proposed to be private.
4. The preliminary storm report adequately demonstrates stormwater management feasibility for the subject property through the use of qualitative analysis, sub-basin delineation, and calculations.

With incorporation of the conditions below, preliminary approval is recommended.

Suggested Conditions of Approval:

Transportation

1. Final construction plans designed by a Professional Engineer licensed in the State of Washington shall be submitted to and accepted by Douglas County prior to construction. Construction plans shall be prepared in accordance with the requirements of the East Wenatchee Municipal Code and Douglas County Code.
2. Include the designation "P-2022-06" on each sheet of the final civil construction plans.
3. Frontage improvements are required along 22nd Street NE in accordance with Figure 3-7b (Urban Local Access) of Douglas County code. 22nd Street NE shall be built to a half-street standard (i.e. 24' wide, curb, gutter, and sidewalk) from the intersection of North Ashland

Avenue to the intersection of North Baker Avenue. The portion of the road heading west to the intersection of North Ashland Avenue can be constructed without sidewalk in order to fit within existing right of way and 24' wide (minimum) paved travel way.

4. Internal private roads shall be constructed to meet the roadway section presented on Figure 3-7a of the Douglas County Road Standards, with the exception that the applicant is allowed to omit sidewalk on the east side and utilize a tract width of 40 feet. The construction plans shall show no parking signs along the east side of the private drive and within the cul-de-sac.
5. The access easements for Lots 2, 6, 7, 8, and 14 shall be of sufficient width to include the proposed retaining walls required for the driveways.
6. EWMC requires provision of snow storage in sections 12.53.010.C.3.J and 17.72.010.C.13. The snow storage area shall be a paved 20' by 30' area located in a manner that a snow plow can use it. Douglas County road crews have informed staff that locating the storage areas in general alignment with the road at the end of the cul-de-sac is the best location. Understanding the snow plowing will not be by County crews it is anticipated plowing will be completed in a similar manner to provide sufficient space as necessary to maintain access for large vehicles.
7. Illumination shall be designed and installed consistent with East Wenatchee Municipal Code, Douglas County Code Section 12.57.100 *Roadway Illumination*, and meet Douglas County PUD Standards. The applicant shall be responsible for PUD charges for the connection of street lights to the transformer or hand hole. The type of light fixture to be installed within the public right of way shall be coordinated with Douglas County during construction plan review. In lieu of a street light at the end of the cul-de-sac, permanent driveway pedestal lighting provided by all lots accessing the cul-de-sac may be substituted; provided, that it is noted on the face of the plat.
8. The location of any cluster mailbox units proposed for the subdivision shall be shown on the construction plans. The location shall be accepted by the County Engineer and USPS Postmaster prior to plan acceptance. Cluster mailbox units shall be located within the public right of way or covered within an easement dedicated for such use.
9. Five-foot utility easements (min.) are required along all lots or tracts with County road frontage in accordance with applicable road standards. Utility purveyors may require easements in excess of five feet.
10. All existing and proposed easements shall be clearly delineated with the Auditor's File Number(s) noted as necessary on the final plat.
11. A Private Access Operation and Maintenance Agreement shall be prepared, executed, and recorded by the applicant; the Auditor's File Number(s) shall be noted on the final plat map.
12. Prior to final plat acceptance and/or release of financial security, the Engineer of Record shall provide written certification that the frontage improvements, off-site improvements, internal roads, utility infrastructure, stormwater systems, and grading have been constructed/completed in accordance with the Conditions of Approval, applicable codes, and the accepted construction plans. Monitoring shall be required as determined appropriate by the Engineer of Record and in accordance with the Road Standards, with final reports submitted to Douglas County along with the certification.
13. Final acceptance shall be processed in accordance with Douglas County Code (DCC) Section 12.56.110 *Final Acceptance* and prior to final plat acceptance a Warranty Assurance Agreement shall be completed per DCC 12.50.110.

14. Per DCC Chapter 12.24, all new or revised accesses onto a County road (including temporary accesses) require an approved access permit.
15. Utility installation/replacement/upgrade within the Douglas County right-of-way shall be approved by Douglas County. A permit to perform work in the right-of-way shall be obtained prior to construction. Damage to existing roads resulting from construction activities (including utility extensions required to provide necessary services to the proposed development) shall be repaired to the satisfaction of Douglas County, by the applicant. The extent of repair and/or replacement will be determined during construction plan review and during field inspection of the proposed work within the right-of-way.

Stormwater

1. A final site-specific stormwater plan and report prepared by a Professional Engineer licensed in the State of Washington that conforms to Douglas County Code and the 2019 *Stormwater Management Manual for Eastern Washington* (SWMMEW) shall be submitted to and accepted by Douglas County prior to construction. Final construction plans shall include proposed grading of lots and locations of walls (as applicable).
2. Include the designation "P-2022-06" on the cover sheet of the final stormwater report.
3. Stormwater facilities shall be designed to overflow to the public Right of Way or oversized by 125% of design capacity plus one-foot of freeboard. The volume used to determine that the system meets 125% of design capacity cannot include volume provided by the one-foot of freeboard. A downstream analysis of potential overflow impacts shall be included within the design report.
4. Stormwater facilities shall be located on a separate tract(s) under the functional control of the Homeowners' Association with each lot having an undivided ownership, interest, and responsibility for the tract(s). The final plat shall identify the stormwater tract as tract A, consistent with the civil plans and show easements for drain lines crossing lots.
5. Provisions to provide access for inspection and maintenance of the stormwater tract(s) shall be addressed within the design plans and stormwater report.
6. Prior to any on-site grading occurring or prior to construction plan acceptance (whichever comes first), a Stormwater Pollution Prevention Plan (SWPPP) and a Temporary Erosion and Sediment Control Plan (TESC Plan) shall be submitted to and accepted by Douglas County. The SWPPP and TESC Plan shall be kept on-site at all times and updated as necessary to address and prevent sediment and sediment laden water from leaving the project site.
7. The applicant is responsible for preventing mud, dirt, debris, and stormwater runoff from being tracked or otherwise discharging onto the public Right of Way or adjacent properties.
8. As applicable, registration of facilities that are regulated under the Washington State Department of Ecology's Underground Injection Control Program shall be completed prior to construction.
9. The Engineer of Record shall monitor construction and shall provide as-built drawings and report as necessary along with certification that the improvements have been completed in accordance with the applicable codes, regulations, and accepted plans. UIC registration shall be provided as applicable.
10. Prior to final plat acceptance, a Private Stormwater Operation and Maintenance Agreement shall be executed on standard Douglas County forms. The site plan, details, certification, and

operation and maintenance recommendations are provided to the County. County staff then prepares the agreement for signature and recording by the applicant. A note shall be included on the face of the final plat which states:

“Douglas County will not maintain the private stormwater facilities located within this subdivision. Responsibility for the long term maintenance of the private stormwater facilities is described within the Declaration of Stormwater System Maintenance Covenants recorded under AFN _____.”

11. Roof drains shall be connected to the proposed storm drainage conveyance system along the public and private roads or the lot shall be managed by a lot-specific stormwater system.
12. Any proposed lots which include an on-site infiltration facility will require an engineered construction plan and stormwater report be submitted with the application for a building permit. As applicable, a note shall be included on the face of the final plat which states:

“At the time of building permit submittal for Lots _ - _, an engineered construction plan and stormwater report shall be submitted that conforms to Douglas County Code and the current edition of the Stormwater Management Manual for Eastern Washington. The Engineer of Record shall provide certification that the private on-site stormwater system has been completed in accordance with the accepted plans. A private stormwater operation and maintenance agreement, prepared with standard Douglas County forms, shall be executed and recorded with the Douglas County Auditor prior to occupancy.”

13. Stormwater stubs may be provided to each of the lots which will drain to the facilities on Tract A. As applicable, a note shall be included on the face of the final plat which states:

“At the time of building permit submittal for Lots _ - _, a drainage construction plan shall be submitted which depicts the on-site stormwater conveyance system. The site plan shall include the following information:

- a. Pipe size.
- b. Minimum pipe slope.
- c. Invert elevation at the connection to the stormwater stub.
- d. Finished floor elevation of the structure and garage slab.”

14. Individual lots created within this development are subject to the Douglas County Stormwater Utility annual service charge. This charge is per parcel and is triggered at the time of building permit issuance.
15. Individual/common plan development for this proposal exceeds 1-acre of disturbed ground. This would meet the threshold by the Washington State Department of Ecology (WSDOE) in administering their general permit to discharge stormwater associated with construction activity. The applicant is responsible for acquisition of all applicable permits prior to beginning ground breaking activities, including but not limited to: Construction Stormwater General Permit, Sand & Gravel Stormwater General Permit, and/or Industrial Stormwater General Permit. Compliance with the Washington State Department of Ecology’s regulations is the responsibility of the applicant.



DOUGLAS COUNTY

Transportation & Land Services

STATE OF WASHINGTON

June 30, 2023

Martin Davy, PE
Pacific Engineering
200 South Columbia Street, Suite 300
Wenatchee, WA 98801

Subject: P-2022-06 – Dan Feil Plat
REQUEST FOR ALTERNATIVE TO CODE

Dear Mr. Davy,

Douglas County Transportation and Land Services received your request for an alternative to the East Wenatchee Municipal Code (EWMC). Your request (dated July 5, 2022) for an alternate has been reviewed and accepted by the County Engineer as conditioned below:

1. It is acceptable to construct private road improvements within the project in substantial conformance with the layout presented in the request dated July 5, 2022 and preliminary construction drawings dated April 19, 2023. This alternate allows for the omission of sidewalk (typically required per DCC figure 3-7a) on the east side of the private road and the corresponding reduced width of the private road tract to be 40 feet.

The attached memorandum of acceptance will be included within the project file. The proposed request appears to comply with the goals and policies of the *Greater East Wenatchee Area Comprehensive Plan*.

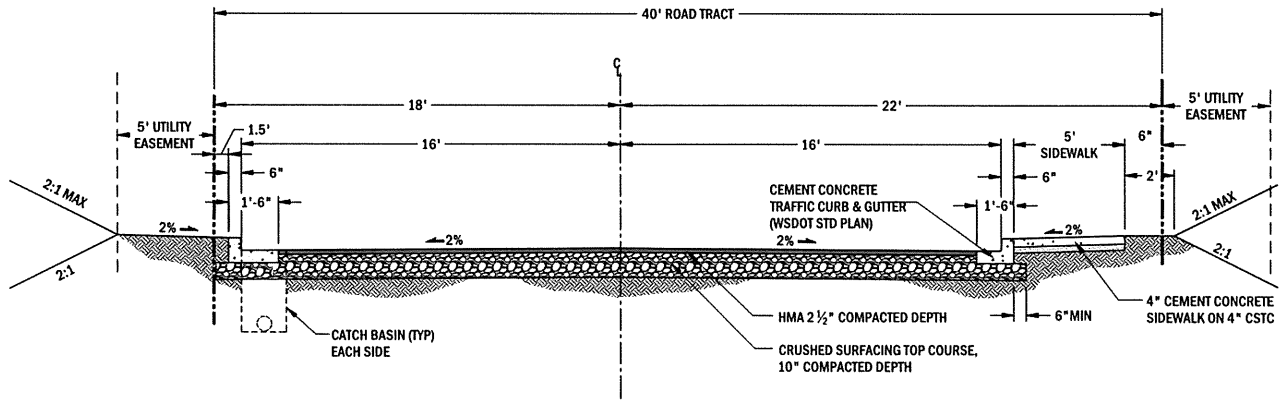
Please do not hesitate to contact me if there are any additional questions in this regard.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Neer".

Mike Neer, PE
Development Review Engineer

PRELIMINARY CONSTRUCTION PLAN SHEET C2.3:



(D) PRIVATE ROAD A
NOT TO SCALE

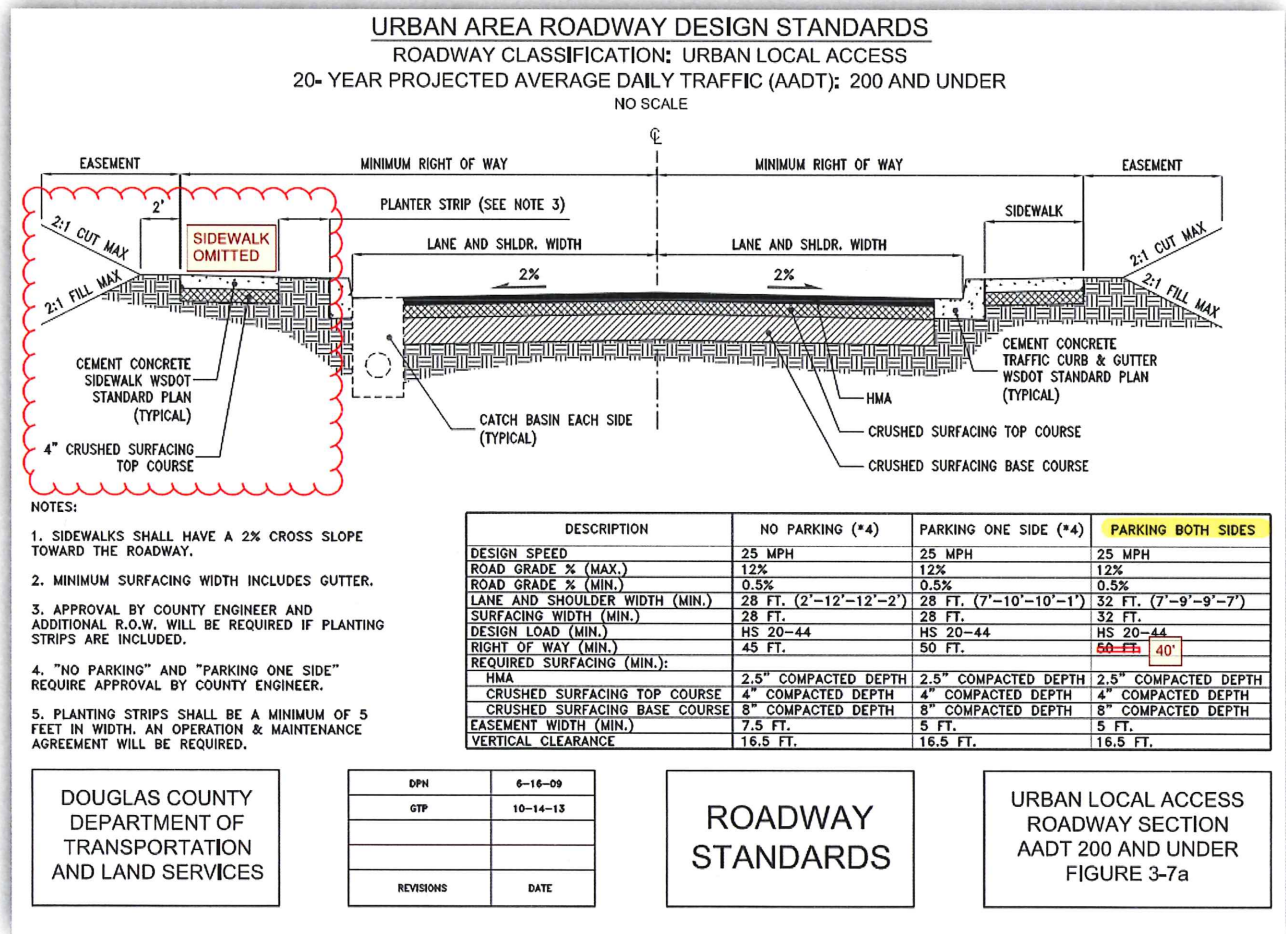
MEMORANDUM

To: Aaron Simmons, PE, County Engineer
CC: Jennifer Lange, PE; Jordan Brown, EIT; Eva Isidro, CPT
From: Mike Neer, PE
Date: June 30, 2023
Re: P-2022-06 – Dan Feil Plat
 REQUEST FOR ALTERNATIVE

A request for an alternative to code based on East Wenatchee Municipal Code Section (EWMC) 12.50.100D were submitted for consideration on June 14, 2023.

The requested alternatives to EWMC 12.52.040B are outlined below:

Douglas County Road Standards Figure 3-7a (Urban Local Access):



The property owner's authorized agent, Mr. Davy, is requesting that an alternate to code be accepted that allows:


1. Construction of private road improvements to an alternate standard, utilizing a reduced roadway section in substantial conformance with the layout presented in the request dated June 14, 2023.

The proposal will provide a more affordable solution that does not appear to adversely affect safety, maintainability, or aesthetics and will help facilitate urban infill in accordance with the goals and policies of the *Greater East Wenatchee Area Comprehensive Plan*.

DCTLS has reviewed the request and generally agrees with the conclusions; approval is recommended as conditioned below:

1. It is acceptable to construct private road improvements within the project in substantial conformance with the layout presented in the request dated July 5, 2022 and preliminary construction drawings dated April 19, 2023. This alternate allows for the omission of sidewalk (typically required per DCC figure 3-7a) on the east side of the private road and the corresponding reduced width of the private road tract to be 40 feet.

Accepted – Douglas County TLS



Aaron Simmons, PE – County Engineer

Date: July 3, 2023

Attachments: Alternative Request



July 5, 2022

Mr. Aaron Simmons, PE
Douglas County TLS
140 NW 19th Street, Suite A
East Wenatchee, WA 98802

PROJECT: Dan Feil Subdivision off NE 22nd Street
Project No. 21061CB

SUBJECT: Design Alternatives

Dear Aaron,

At the Pre-application Conference (Pre-App-2021--34) in April 2022 for this proposed major subdivision, it was noted that staff would support an alternate to code request for the internal road to be a private road utilizing Figure 3-7a with no parking provided.

I am additionally requesting the following:

- Elimination of the sidewalk on the east side of the internal roadway.
- Reduction of the road tract width to 35ft width, compared with the 45-ft Right of Way shown on 3-7a.
- Elimination of the consideration of design speed for the curve at the far end of the internal road where it enters the hammerhead turnaround, instead designing the curve for low-speed maneuvers only.

I am therefore writing to request this alternate to code prior to submittal of the preliminary plat application, addressing the applicable points within DCC 12.50.100(D) as laid out below. I have attached the proposed lot layout and internal road alignment for your review along with this request.

DCC 12.50.100(D) 1. Specifically outline the reason for the alternative request.

Internal road to be a private road utilizing Figure 3-7a with no parking provided.

3-7a has a standard cross section with no parking as an option, but its use requires approval from the County Engineer. It is requested to reduce the amount of pavement and therefore to increase the area available on lots for homes, garages and landscaping. This will reduce direct construction costs and the size of stormwater facilities needed, enhancing affordability. Each home will be constructed with a minimum 300 sf car port or garage, with guest parking available on driveways on the lot. Therefore, the additional parking provided by the wider street section is not necessary.

Elimination of the sidewalk on the east side of the internal roadway

It is requested to reduce the amount of concrete and therefore to increase the area available on lots for homes, garages and landscaping. This will reduce direct construction costs and the size of stormwater facilities needed, enhancing affordability.

Reduction of the road tract width to 35ft width, compared with the 45-ft Right of Way shown on 3-7a

It is requested to reduce the road tract area and therefore to increase the lot sizes and the area available for homes, garages and landscaping.

Elimination of the consideration of design speed for the curve at the far end of the internal road

It is requested to allow a reduction in the centerline radius and therefore allow more buildable area on the adjacent lot on the inside of the curve.

DCC 12.50.100(D) 2. Specify the chapter and section for which the alternative is requested.

Internal road to be a private road utilizing Figure 3-7a with no parking provided.

The alternative/waiver is requested for EWMC 12.60.010 which references Douglas County code Figure 3-7a.

Elimination of the sidewalk on the east side of the internal roadway

The alternative/waiver is requested for EWMC 12.60.010 which references Douglas County code Figure 3-7a.

Reduction of the road tract width to 35ft width, compared with the 45-ft Right of Way shown on 3-7a

The alternative/waiver is requested for EWMC 12.60.010 which references Douglas County code Figure 3-7a.

Elimination of the consideration of design speed for the curve at the far end of the internal road

The alternative/waiver is requested for EWMC 12.52.040 B, where Table 12.52.040-2 'Design Speeds' requires a design speed of 25 mph in flat and rolling terrain.

DCC 12.50.100(D) 3. Provide supporting evidence demonstrating that an alternative from these standards is based on sound engineering judgment that the requirements for safety, function, appearance, fire protection and maintainability are fully met and complies with the Douglas County Comprehensive Plan and appropriate sub-area plan if applicable.

Internal road to be a private road utilizing Figure 3-7a with no parking provided.

- Safety: Parking will be prohibited, and therefore the remaining width available for moving traffic will be 14ft per lane (12ft driving lane, 2ft 'shy' distance), compared with 9ft for the 'standard' option with parking both sides. This is a safety enhancement with more width and no opportunity for pedestrians to step out from between parked vehicles into traffic.
- Function: The function is to allow vehicles to travel from origin to destination in all weather conditions at an appropriate speed. The 12 ft driving lanes meet that function fully.
- Appearance: Less pavement leaves more room for landscaping, improving appearance.
- Fire Protection: The 12ft driving lanes provide more room for fire trucks than the 'standard' option with 9ft lanes. IFC requirements are met by providing 26ft clear width adjacent to the fire hydrants.
- Maintainability: The reduced width street will be no more difficult or expensive to maintain than the 'standard' width street. With no parking allowed, street sweeping and plowing will be easier.

Elimination of the sidewalk on the east side of the internal roadway

- Safety: Pedestrians from 11 homes on the east side of the development will need to cross the street to reach the proposed sidewalk on the west side of the internal road. With the 28-ft wide private dead-end street, and peak-hour traffic around one trip every three minutes, there will be marginal reduction in safety, if any.
- Function: The function is to allow pedestrians reach the sidewalk along the nearest County Road, NE 22nd Street. For residents of the 11 lots on the east side of the private road, there will be a minor inconvenience of crossing the 28-ft wide road to reach the sidewalk on the west side.
- Appearance: Less sidewalk leaves more room for landscaping, improving appearance.
- Fire Protection: No effect
- Maintainability: There is less sidewalk to maintain.

Reduction of the road tract width to 35ft width, compared with the 45-ft Right of Way shown on 3-7a

- Safety: No effect
- Function: No effect
- Appearance: No effect
- Fire Protection: No effect
- Maintainability: No effect

Elimination of the consideration of design speed for the curve at the far end of the internal road

- Safety: Warning signs will be posted to enhance awareness of the upcoming bend in the roadway. This will tend to slow vehicles down, which is a safety enhancement.
- Function: The function of this portion of roadway is to provide access for automobiles to homes and for Fire Trucks and other larger vehicles to the hammerhead where they can turn around. This function is maintained with the chosen road centerline and curb radii.
- Appearance: No adverse effect
- Fire Protection: The smaller radius can accommodate the maneuvering of a Fire Truck so no effect
- Maintainability: No adverse effect

DCC 12.50.100(D) 4. The above information shall be used by the county engineer in evaluating requests for the use of alternatives to these standards. Alternative requests that conflict with the International Fire Code as adopted by Douglas County shall also require written concurrence from the county fire marshal.

No answer required.

DCC 12.50.100(D) 5. Any alternative proposal which achieves the standard but at an equal or greater value. (Ord. TLS 13-11-40B Exh. B (part): Ord. TLS 09-11-49E (Exh. B) (part): Ord. TLS 04-02-30B Exh. A (part))

Not Applicable.

Aaron Simmons PE,
Dan Feil Subdivision – Design Alternatives
July 5, 2022

Please consider this request for a design alternative and inform me of your response.

If you have any questions or require additional information, please email or call me at 509.662.1161.

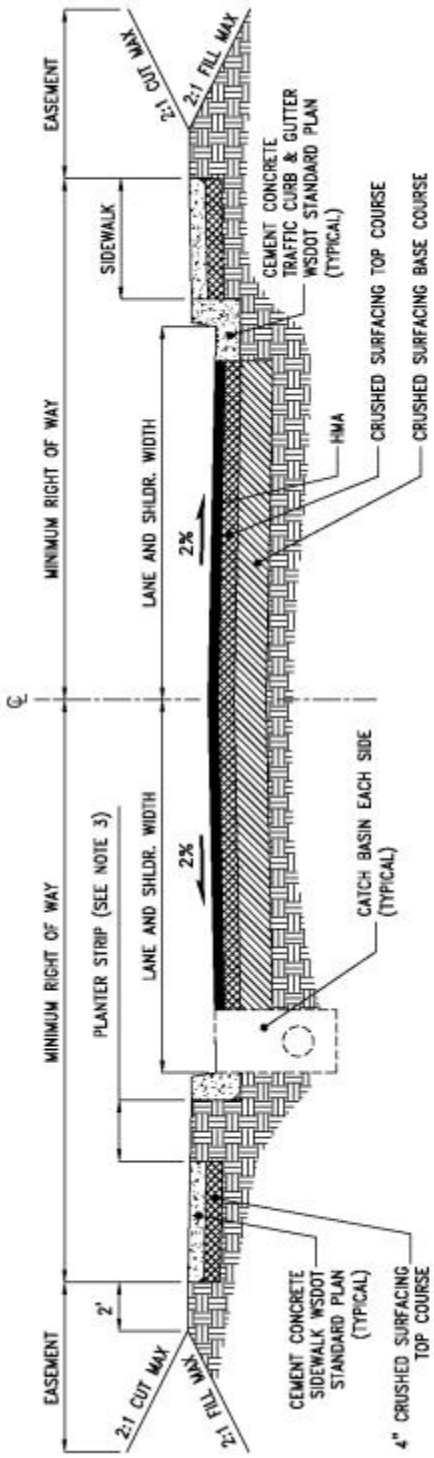
Sincerely,

A handwritten signature in black ink, appearing to read "Martin Davy". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Martin Davy, PE
Senior Civil Engineer

Attachments

URBAN AREA ROADWAY DESIGN STANDARDS
ROADWAY CLASSIFICATION: URBAN LOCAL ACCESS
20-YEAR PROJECTED AVERAGE DAILY TRAFFIC (AADT): 200 AND UNDER
 NO SCALE



NOTES:

1. SIDEWALKS SHALL HAVE A 2% CROSS SLOPE TOWARD THE ROADWAY.
2. MINIMUM SURFACING WIDTH INCLUDES GUTTER.
3. APPROVAL BY COUNTY ENGINEER AND ADDITIONAL R.O.W. WILL BE REQUIRED IF PLANTING STRIPS ARE INCLUDED.
4. "NO PARKING" AND "PARKING ONE SIDE" REQUIRE APPROVAL BY COUNTY ENGINEER.
5. PLANTING STRIPS SHALL BE A MINIMUM OF 5 FEET IN WIDTH. AN OPERATION & MAINTENANCE AGREEMENT WILL BE REQUIRED.

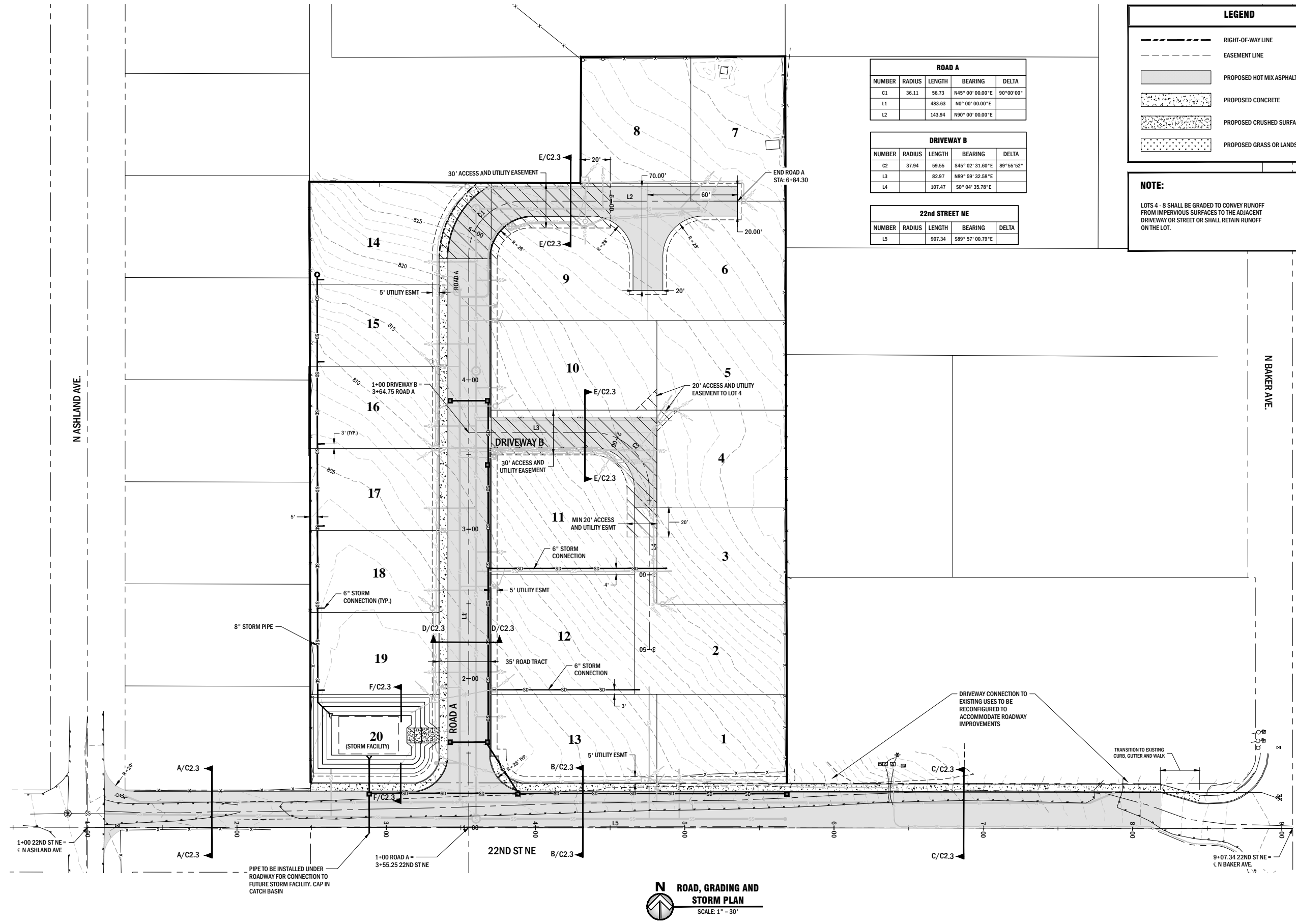
DESCRIPTION	NO PARKING (*4)	PARKING ONE SIDE (*4)	PARKING BOTH SIDES
DESIGN SPEED	25 MPH	25 MPH	25 MPH
ROAD GRADE % (MAX.)	12%	12%	12%
ROAD GRADE % (MIN.)	0.5%	0.5%	0.5%
LANE AND SHOULDER WIDTH (MIN.)	28 FT. (2'-12"-12'-2")	28 FT. (7'-10"-10'-1")	32 FT. (7'-9"-9'-7")
SURFACING WIDTH (MIN.)	28 FT.	28 FT.	32 FT.
DESIGN LOAD (MIN.)	HS 20-44	HS 20-44	HS 20-44
RIGHT OF WAY (MIN.)	45 FT.	50 FT.	50 FT.
REQUIRED SURFACING (MIN.):			
HMA	2.5" COMPACTED DEPTH	2.5" COMPACTED DEPTH	2.5" COMPACTED DEPTH
CRUSHED SURFACING TOP COURSE	4" COMPACTED DEPTH	4" COMPACTED DEPTH	4" COMPACTED DEPTH
CRUSHED SURFACING BASE COURSE	8" COMPACTED DEPTH	8" COMPACTED DEPTH	8" COMPACTED DEPTH
EASEMENT WIDTH (MIN.)	7.5 FT.	5 FT.	5 FT.
VERTICAL CLEARANCE	16.5 FT.	16.5 FT.	16.5 FT.

**URBAN LOCAL ACCESS
 ROADWAY SECTION
 AADT 200 AND UNDER
 FIGURE 3-7a**

**ROADWAY
 STANDARDS**

DPN	9-18-09
GTP	10-14-13
REVISIONS	DATE

**DOUGLAS COUNTY
 DEPARTMENT OF
 TRANSPORTATION
 AND LAND SERVICES**



ROAD A				
NUMBER	RADIUS	LENGTH	BEARING	DELTA
C1	36.11	56.73	N45° 00' 00.00"E	90° 00' 00"
L1		483.63	N0° 00' 00.00"E	
L2		143.94	N90° 00' 00.00"E	

DRIVEWAY B				
NUMBER	RADIUS	LENGTH	BEARING	DELTA
C2	37.94	59.55	S45° 02' 31.60"E	89° 55' 52"
L3		82.97	N89° 59' 32.58"E	
L4		107.47	S0° 04' 35.78"E	

22nd STREET NE				
NUMBER	RADIUS	LENGTH	BEARING	DELTA
L5		907.34	S89° 57' 00.79"E	

LEGEND

- RIGHT-OF-WAY LINE
- - - EASEMENT LINE
- [Pattern] PROPOSED HOT MIX ASPHALT
- [Pattern] PROPOSED CONCRETE
- [Pattern] PROPOSED CRUSHED SURFACING
- [Pattern] PROPOSED GRASS OR LANDSCAPING

NOTE:
 LOTS 4 - 8 SHALL BE GRADED TO CONVEY RUNOFF FROM IMPERVIOUS SURFACES TO THE ADJACENT DRIVEWAY OR STREET OR SHALL RETAIN RUNOFF ON THE LOT.

REV	DATE	DESCRIPTION
0	7/06/2022	INITIAL ISSUE

PACIFIC ENGINEERING
 200 S. COLUMBIA STREET, SUITE 300, WENATCHEE, WA 98801
 (509) 882-1161 www.pacificeng.com

DAN FEIL SUBDIVISION PRELIMINARY

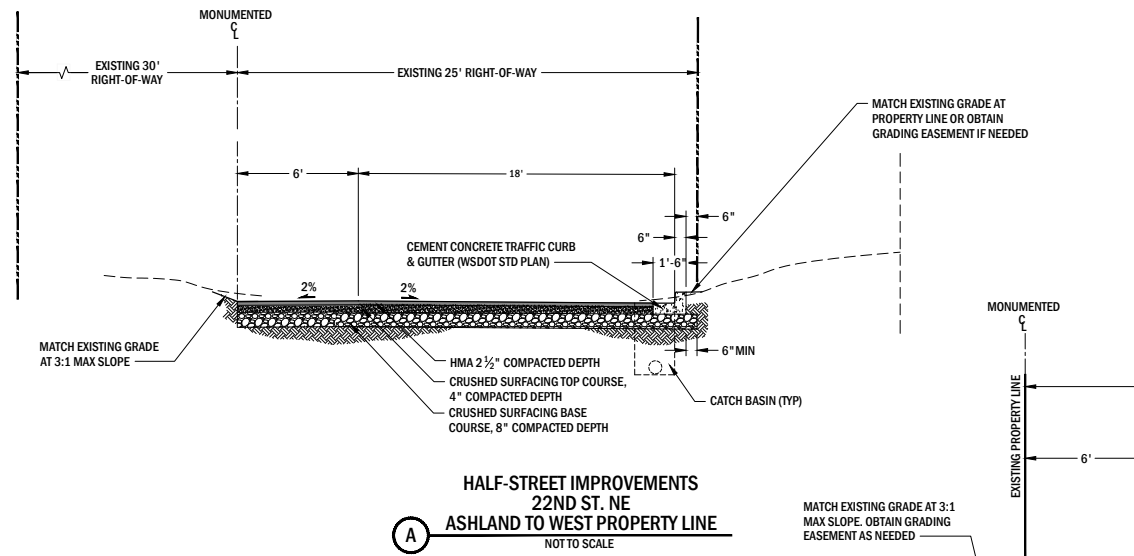
DAN FEIL
 DAN FEIL SUBDIVISION
 DOUGLAS COUNTY, WA
 PROJECT NO. 21061CB

IF NOT ONE INCH ON THIS SHEET
 SHOW SCALE ACCORDINGLY

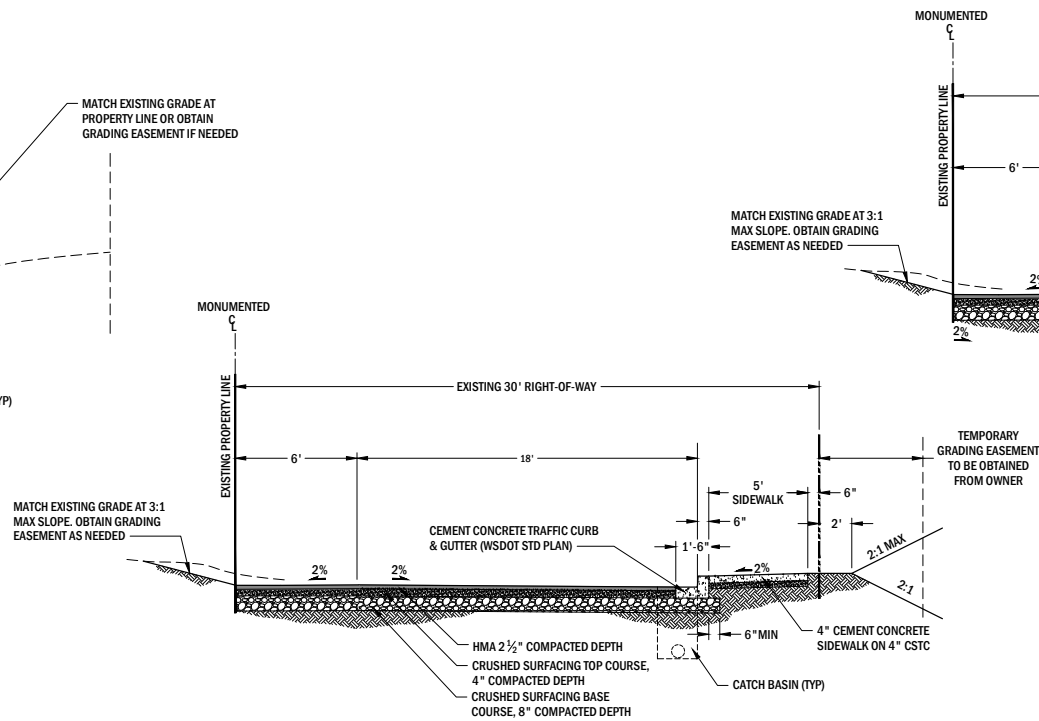
PRELIMINARY ROAD, GRADING & STORM PLAN

C2.0

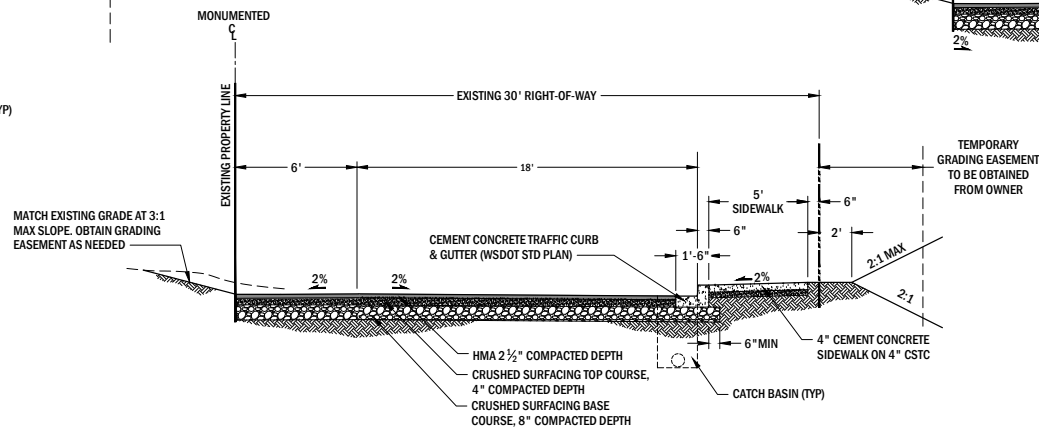
ROAD, GRADING AND STORM PLAN
 SCALE: 1" = 30'



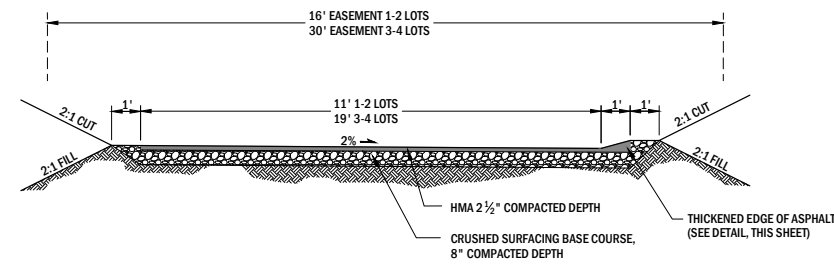
A HALF-STREET IMPROVEMENTS
22ND ST. NE
ASHLAND TO WEST PROPERTY LINE
NOT TO SCALE



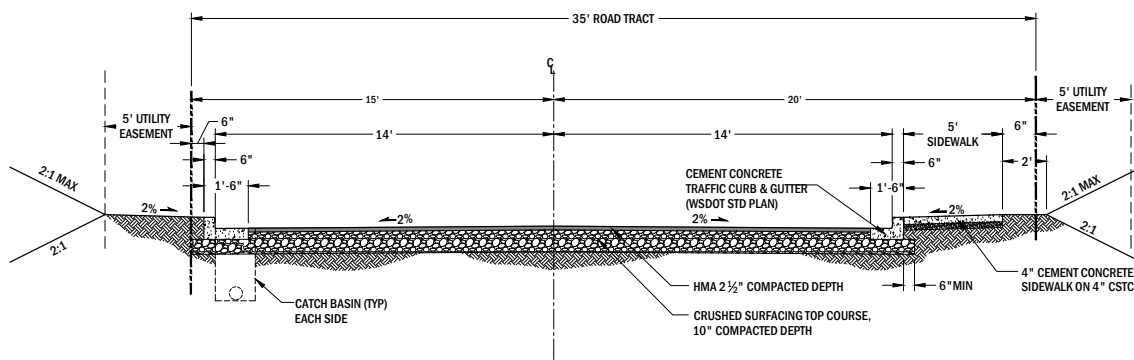
B HALF-STREET IMPROVEMENTS
22ND ST. NE
ALONG PROJECT FRONTAGE
NOT TO SCALE



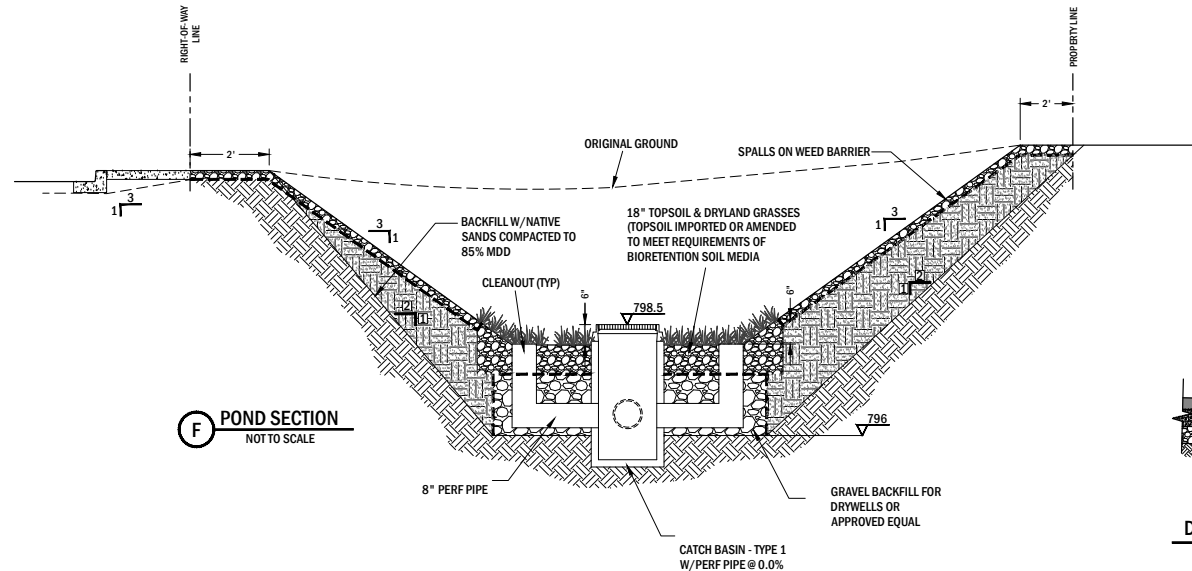
C HALF-STREET IMPROVEMENTS
22ND ST. NE
EAST PROPERTY LINE TO BAKER
NOT TO SCALE



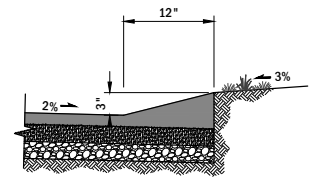
E TYPICAL PRIVATE DRIVEWAY SECTION
NOT TO SCALE



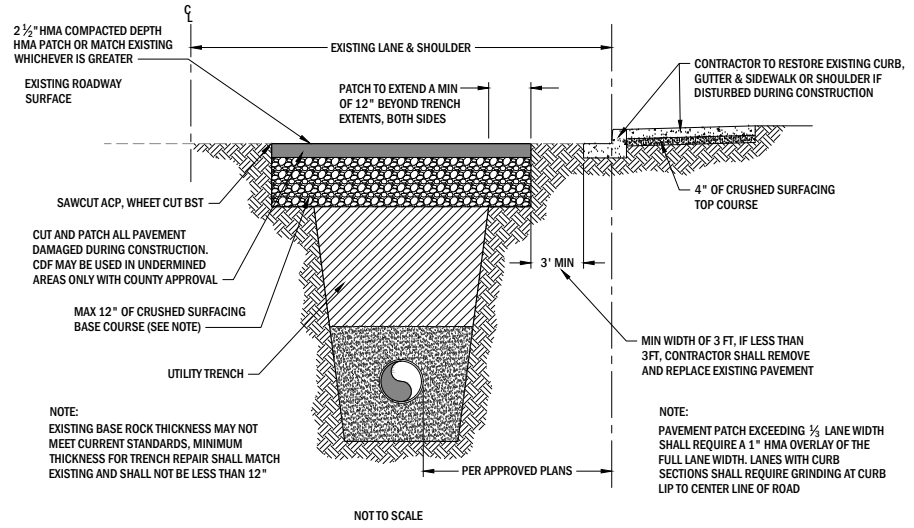
D PRIVATE ROAD A
NOT TO SCALE



F POND SECTION
NOT TO SCALE



DETAIL AT THICKENED EDGE
NOT TO SCALE



NOT TO SCALE

DOUGLAS COUNTY DEPARTMENT OF TRANSPORTATION AND LAND SERVICES

ROADWAY STANDARDS

PAVEMENT REPAIR DETAIL FIGURE 3-12

REV	DATE	DESCRIPTION
0	7/06/2022	INITIAL ISSUE

PACIFIC ENGINEERING
200 & COLUMBIA STREET, SUITE 300, WENATCHEE, WA 98801
(509) 882-1161 www.pacificeng.net

DAN FEIL SUBDIVISION

PRELIMINARY

DAN FEIL
DOUGLAS COUNTY, WA
PROJECT NO. 21061CB

IF NOT ONE INCH ON THIS SHEET
ADJUST SCALE ACCORDINGLY

SECTIONS & DETAILS

C2.3

Shari Tincher (x6589)

From: Tanner Ackley (x6544)
Sent: Tuesday, December 27, 2022 9:49 AM
To: Shari Tincher (x6589)
Subject: FW: comments on application for subdivision #P-2022-06

Please upload to P-2022-06.

Thank you,
Tanner

From: Becky Cate [<mailto:meckers@hotmail.com>]
Sent: Thursday, December 22, 2022 6:49 PM
To: Tanner Ackley (x6544) <tackley@co.douglas.wa.us>
Cc: Becky Cate <meckers@hotmail.com>
Subject: comments on application for subdivision #P-2022-06

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Mr. Ackley,
I have some questions and concerns regarding the proposed 20 lot major subdivision (application number P-2022-06 Applicant: Dan Feil Holdings).

Irrigation

- The irrigation line for the lot that is being subdivided, and my property (Lot 1 Larry Dugan Short Plat (p/n 40900003715) enters on the Eastern side of the existing Lot 2 of Larry Dugan Short Plat. The existing irrigation line which services my parcel continues across the northern portion of the property onto my parcel. The line crosses the proposed lots 7 and 8 as shown on the Feil 22nd street Preliminary Plat. I don't see any easements or allowances for irrigation on the proposed plat.
- I believe there is also another irrigation line further south that crosses Lot 2 of Larry Dugan Short Plat in an East to West direction. That line is also not shown on the plat.

What is the maximum number of lots allowed in a subdivision in this area? The density of the lots doesn't fit the surrounding area. The surrounding lots are 0.20 acres or larger.

I would like to be notified of all decisions, meetings, etc. regarding this proposal.

Thank you,
Rebecca Cate

Dec. 21, 2022

To Janner Ackley,

I'm writing in reference to Dan Neil's application for a lot subdivision. I talked to you about this before. I live in front of the property in question, and I am not against houses being built back there, but I want whoever decides this to know that there are several irrigation lines running through that property. I talked to Dan about this several months ago, and he knows about it, but I wanted to put it in writing. I'm 85 years old so I may not even be here by the time anything is done, but I want to be sure my irrigation lines are safe. Thank you.

Sincerely,

Jean Fowers

2213 N. Ashland
E. Wenatchee, Wa. 98802
509-884-5830

Tanner Ackley, Principal Planner
140 19th Street NW, Suite A
East Wenatchee WA 98802

Re: Application number P-2022-06
Dan Feil Holdings LLC

I live at 2129 N. Baker Avenue on property originally owned by my parents since 1940. I grew up on this property. My home was built by my parents in 1961. I have owned their home since 1997 and have enjoyed the view of the mountains and city lights.

I am very stressed that the Dan Feil development will destroy my view and also greatly devalue my property. From Baker Avenue there is a dropoff of 15 feet or more and I pray that this will not be filled in to the current street level. If homes are built at the Baker Avenue level it would completely cut off my view of all of the city and the lower part of the mountains. Please take this into consideration.

Over the years when ever I saw water shooting in the air from a broken sprinkler or pipe I would call Jack Feil and advise him.

I hope that this relative will be thoughtful enough to consider how this development will affect the lives of those who live around the perimeter of the area.

Regards,
Beverly Coleman
Beverly Coleman

12/12/2022