



Date: March 17, 2022

Applicant Name: Chasen Simpson, Latitude 48 Engineers

Applicant Email: chasen@latitude-48.com

Manager Level Drainage and Wastewater Determination: DPD-DWWM-22-00003

Preliminary Assessment Report (PAR): 001084-21PA

Project Address: 9250 College Way North

Project Description: Approximately 200 units of residential housing and 6000 square foot single story Longhouse cultural space for assembly. The residential use will be in two separate structures. The southern building proposed as three stories and the northern building as four stories.

System Improvement Requirement: This project shall meet the requirements of the Wetland Protection Standard SMC 22.805.080.B.1 to protect the functions and values of a wetland and its buffers. The total volume of stormwater discharging into a wetland shall not be more than:

- During a single precipitation event, 20 percent higher or lower than the pre-project volume, and
- On a monthly basis, 15 percent higher or lower than the pre-project volume.

Summary: Request to remove the system improvement requirements under Director's Rule ENG-430.E., a code alternative is applicable.

THIS REQUEST IS DENIED.

Applicant's Reason(s) for Request: The pre-project land cover is entirely characterized as "grass". Therefore, development of any kind that includes hardscape would result in an increase in stormwater volume discharging from the site into the wetland. According to SMC 22.805.080.B.1, mitigation strategies may include an alternative discharge location or infiltration - both were evaluated. The alternate discharge location includes a capacity constrained storm system and also drains to a wetland. Infiltration is infeasible for the site according to Seattle Department of Construction and Inspections (SDCI) mapping and as advised by the geotechnical engineer.

Applicant's Proposed Alternative Solution(s): The Wetland Protection Standard cannot be achieved for development on this site because the pre-project land cover is characterized as "grass". A comprehensive hydrologic analysis of the entire wetland drainage basin was performed and determined there to be an annual volumetric increase of only 1% as a result of development of this affordable housing project. Therefore, we feel that there is no net loss of wetland functions or values as a result of our project.

Review Committee Response:

The request states that an adopted standard cannot be met: "*The Wetland Protection Standard cannot be achieved [emphasis added] for development on this site because the pre-project land cover is characterized as "grass". These are grounds for an "Exception" request; 22.800.040.C.19(c) - The requirement is not technically feasible [emphasis added], and the criteria for an adjustment cannot be met.*" In order to further evaluate this as an adjustment request, some additional information, as described below, is necessary:

Please describe how the Wetland Flow Protection standard 22.805.080.B was analyzed and submit a copy of the Wetland classification as "*determined by a wetland professional per rules promulgated under subsection*

25.09.330.C (Technical reports).” It appears that, based on submitted monthly percentage increases that the project may comply with 22.805.080.B.1(d) - Method 2: Site Discharge Modeling; “On a monthly basis, 15 percent higher or lower than the pre-project volume.”

The Utility System Improvement Determination Request states as the reason for the request: *The pre project land cover is entirely characterized as "grass". Therefore, development of any kind that includes hardscape would result in an increase in stormwater volume discharging from the site into the wetland. According to SMC 22.805.080.B.1, mitigation strategies may include an alternative discharge location or infiltration - both were evaluated. The alternate discharge location includes a capacity constrained storm system and also drains to a wetland. Infiltration is infeasible for the site according to SDCI mapping and as advised by the geotechnical engineer.*

Additionally, the “Wetland Determination Request (Supporting Docs.).pdf” states that with regard to infiltration, “*Infeasible - Soils not conducive for infiltration according to SDCI mapping and as advised by the geotechnical engineer*” SPU GIS maps indicates Qvt (Till) with a “medium” infiltration potential. Please provide the geotechnical report to substantiate infeasibility.

This reference also states that “*Evaluated stormwater volume reduction mitigation strategies including: infiltration and alternative discharge location*”, there are other stormwater volume reduction methods that have not been evaluated, notably rainwater harvesting and vegetated roof. Please evaluate how these BMP’s could be implemented to help meet the wetland protection standard.

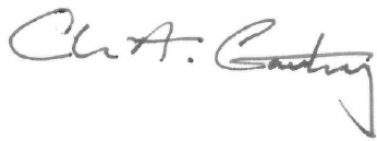
A qualified professional experienced in wetland evaluations should evaluate and provide their analysis and concurrence that, if an adjustment is granted, the deviation meets the criteria of a *substantially equivalent environmental protection*.

Please provide the above required documentation to your SDCI drainage reviewer for review and approval.

Review Committee Decision: The requirements outlined in PAR 001084-21PA are upheld.

If you have further questions, please contact Christopher.Courtney@seattle.gov or 206-684-5919.

Sincerely,



Christopher Courtney
SPU Development Services Office (DSO) – Operations Manager

CC: Jon Ford P.E. – Project Requirements & Plan Review Supervisor, SPU DSO
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Steve Resnick P.E. – Engineering & Plan Review, SPU DSO
Kevin Burrell – Manager, Policy & Regulatory, SPU Drainage and Wastewater (DWW) Line of Business
Cris Horbelt – Side Sewer Code & Policy, SPU DWW Line of Business



Ede Courtenay – Manager, Seattle Department of Construction and Inspections (SDCI)
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