



**LP22-00002/SEP22-0023: All Comment Letters  
13 pages**

August 24, 2022

Karen Witherspoon, AICP, Senior Project Planner  
Lewis County Community Development Dept.  
2025 NE Kresky Avenue  
Chehalis, WA 98532

Re: Sunfisher Subdivision—SEPA DNS (File Nos. SEP22-0023; LP22-00002)  
US 12 MP 130.22

Dear Ms. Witherspoon:

Washington State Department of Transportation (WSDOT) staff has reviewed the Sunfisher Subdivision and SEPA DNS. Approval of this application will permit the division of approximately 13.89 acres into 36 separate lots, with access provided by a new private road. WSDOT would like to address our concerns and offer the following comments.

The Access Management Law (Chapter 468-52 WAC) has classified this portion of US 12 as a Class 2 highway. These highways have the capacity for providing interregional, intercity, and intracity travel needs in a safe and efficient manner. Direct access serving abutting land is subordinate to providing service to traffic movement. Spacing of intersecting streets, roads, and highways shall be planned with a minimum spacing of one-half mile. Intersection spacing with less than one-half mile may be permitted, but only when no reasonable alternative access exists.

As a Class 2 highway, private direct access to the state highway system shall be permitted only when the property has no other reasonable access to the general street system. When direct access must be provided, the following conditions shall apply:

- The access connection shall continue until such time that other reasonable access to a highway with a less restrictive access control classification or acceptable access to the general street system becomes available and is permitted.
- The minimum distance to another public or private access connection shall be six hundred sixty feet. No more than one connection shall be provided to an individual parcel or to contiguous parcels under the same ownership and can be shown that the additional access would not adversely affect the desired function, safety, or operation of the state highway.
- Variance permits may be allowed if conditions warrant and are demonstrated to the satisfaction of the department by a traffic analysis, signed and sealed by a qualified professional engineer, who is registered in accordance with chapter 18.43 RCW, which is included with the connection permit application.

- No additional access connections to the state highway shall be provided for newly created parcels resulting from property divisions. Internal road networks shall provide all access for such parcels. Access to the state highway will be at existing permitted connection locations or at revised connection locations, as conditions warrant.

The proposed configuration of this subdivision includes two access connections to US 12 – one for the private road serving the newly created lots, and an emergency access approximately 200 feet east of the primary access. To permit an additional access connection, justification for the need of an additional access must be provided. Additionally, as the additional access connection will require a variance permit, a Traffic Impact Analysis will be required. The applicant is encouraged to contact Mr. Jeff Barsness, Southwest Region Development Services Engineer, at [BarsneJ@wsdot.wa.gov](mailto:BarsneJ@wsdot.wa.gov) for further information on the process to obtain an Access Connection Permit.


Because of the proximity of your project to the state highway system, noise generated by traffic may be greater than the level established for control of highway noise by Federal highway Administration (FHWA) regulations. Because the highway predates this development, WSDOT will not be responsible for any traffic noise mitigation measures that may be necessary.

WSDOT's drainage policy states that there will be no net gain in the storm water runoff transported to the WSDOT right of way from adjacent property. Proposed changes to storm water runoff will require the proponent to contact WSDOT directly, or through the permitting agency, to obtain WSDOT approval. Hydraulic calculations and plans must be submitted for WSDOT review and approval. The drainage plans and calculations will need to meet the requirements set forth in the WSDOT Hydraulics Manual (Engineer Publication M23-03) and the Highway Runoff Manual (Engineer Publication M31-16).

These comments are based on a preliminary review of your project. As this project progresses, there may be a need for additional information by this department for further review. *This review does not constitute final approval by WSDOT.*

Thank you for the opportunity to comment on the above referenced project. If you have any questions or need additional information, please contact me at [BassD@wsdot.wa.gov](mailto:BassD@wsdot.wa.gov) or at 360-831-5829.

Sincerely,

A handwritten signature in black ink that reads "Dylan M. Bass". The signature is written in a cursive, flowing style.

Dylan Bass  
Development Review Planner  
WSDOT Southwest Region

RECEIVED 08/26/2022



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office  
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

August 25, 2022

Karen Witherspoon, AICP, Senior Project Planner  
Lewis County  
Department of Community Development  
2025 NE Kresky Avenue  
Chehalis, WA 98532

Dear Karen Witherspoon:

Thank you for the opportunity to comment on the determination of nonsignificance for the Sunfisher Subdivision Project (SEP22-0023) as proposed by Packwood Land Company LLC. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287**

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department for proper management of these materials

**WATER QUALITY/WATERSHED RESOURCES UNIT:  
Evan Wood (360) 706-4599**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

Karen Witherspoon

August 25, 2022

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1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted. For additional information on contaminated construction sites, please contact Carol Serdar at [Carol.Serdar@ecy.wa.gov](mailto:Carol.Serdar@ecy.wa.gov), or by phone at (360) 742-9751.

Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at: <https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx>.

The applicant may apply online or obtain an application from Ecology's website at: [http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application](http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(GMP:202203907)

cc: Derek Rockett, SWM  
Evan Wood, WQ

## Karen Witherspoon

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**From:** Meyer, Zachary (ECY) <ZMEY461@ECY.WA.GOV>  
**Sent:** Monday, August 8, 2022 2:41 PM  
**To:** Karen Witherspoon  
**Cc:** Megan Sathre  
**Subject:** [Spam?] RE: SEP22-0023 and LP22-00002 Sunfisher Subdivision

**Importance:** Low

Hi Karen,

It is unclear from the materials I reviewed, but the project should appropriately buffer the on-site/nearby stream.

Feel free to reach out if I can be of any assistance.

Zach Meyer (*he/him*)  
Shorelands Technical and Regulatory Lead  
Shorelands & Environmental Assistance Program  
Washington State Department of Ecology  
Southwest Regional Office, Lacey, WA  
360-481-9885



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**From:** Megan Sathre <Megan.Sathre@lewiscountywa.gov>  
**Sent:** Friday, August 05, 2022 9:02 AM  
**To:** DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>; 'SW-SEPA-REVIEW@WSDOT.WA.GOV' <SW-SEPA-REVIEW@WSDOT.WA.GOV>; R5 Planning (DFW) <R5.Planning@dfw.wa.gov>; DAHP SEPA (DAHP) <sepa@dahp.wa.gov>; 'Tina@swcleanair.org' <Tina@swcleanair.org>; 'Evan.Carnes@usace.army.mil' <Evan.Carnes@usace.army.mil>; Meyer, Zachary (ECY) <ZMEY461@ECY.WA.GOV>; 'wiyall@cowlitz.org' <wiyall@cowlitz.org>; 'rsalakory@cowlitz.org' <rsalakory@cowlitz.org>; 'Talexander@cowlitz.org' <Talexander@cowlitz.org>; 'NRDpermit@cowlitz.org' <NRDpermit@cowlitz.org>; 'jgordon@cowlitz.org' <jgordon@cowlitz.org>; 'cparrott@chehalistrike.org' <cparrott@chehalistrike.org>; 'dpenn@chehalistrike.org' <dpenn@chehalistrike.org>; 'pfarris@whitepass.k12.wa.us' <pfarris@whitepass.k12.wa.us>; 'aloudermilk@chehalistrike.org' <aloudermilk@chehalistrike.org>; Fasano, Caprice <cfasano@quinault.org>; 'mmobbs@quinault.org' <mmobbs@quinault.org>; 'Troutt.David@nisqually-nsn.gov' <Troutt.David@nisqually-nsn.gov>; 'lclark@lcfwb.gen.wa.us' <lclark@lcfwb.gen.wa.us>; 'joe@twintransit.org' <joe@twintransit.org>; 'chris@washingtonwaterfronts.com' <chris@washingtonwaterfronts.com>; 'kim@bracythomas.com' <kim@bracythomas.com>; 'chris@olyeng.com' <chris@olyeng.com>; Matt Samuelson <matts@lcpud.org>; 'aliciah@lcpud.org' <aliciah@lcpud.org>; Dustin Breen <Dusty.Breen@Lewiscountywa.gov>; 'Cust2188@wasteconnections.com' <Cust2188@wasteconnections.com>; 'lcf10@lewiscounty.com' <lcf10@lewiscounty.com>; 'lcwd3@lewiscounty.com' <lcwd3@lewiscounty.com>  
**Cc:** Karen Witherspoon <Karen.Witherspoon@lewiscountywa.gov>  
**Subject:** SEP22-0023 and LP22-00002 Sunfisher Subdivision

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM - Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link

Greetings,

Lewis County has received a SEPA checklist for a thirty-six (36) lot subdivision (Long Plat) named "Sunfisher." The information is being forwarded to you for review and comment.

All documentation relating to this project can be found here: <https://lewiscountywa.gov/departments/community-development/current-planning-applications/sunfisher-subdivision-36-lots-lp22-00002-type-iii-application/> . The lead agency is Lewis County and the issue date of the DNS is August 11, 2022.

Please review the documents and **make all comments to Karen Witherspoon**, Senior Project Planner, Lewis County Community Development at [Karen.witherspoon@lewiscountywa.gov](mailto:Karen.witherspoon@lewiscountywa.gov). Comments are due by 4:00pm on August 25, 2022.

**Megan Sathre**

Office Assistant Senior

Lewis County Community Development

(360)740-2677

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**This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.**



**RECEIVED**

By K. Witherspoon at 1:10 pm, Aug 16, 2022

Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

August 16, 2022

Ms. Karen Witherspoon  
Senior Project Planner  
Lewis County  
PO Box 790  
Stevenson, WA. 98648

In future correspondence please refer to:  
Project Tracking Code: 2022-08-05420  
Property: Lewis County\_ Sunfisher Long Plat  
Re: Survey Requested

Dear Ms. Witherspoon:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. A desktop review using our statewide predictive model has identified the proposed project area as having high sensitivity for archaeological resources. The proximity to the Cowlitz River and freshwater body gives the proposed project area particular sensitivity for archaeological resources. Further, the scale of the proposed ground disturbing actions would destroy any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey of the project area be conducted prior to ground disturbing activities. We also recommend consultation with the concerned Tribes' cultural committees and staff regarding cultural resource issues.

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

Thank you for the opportunity to comment on this project and we look forward to receiving the survey report. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. Should you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw  
Transportation Archaeologist  
(360) 485-5014  
dennis.wardlaw@dahp.wa.gov







## *Lewis County Department of Public Works*

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Josh S. Metcalf, PE, Director

Tim D. Fife, PE, County Engineer

### **MEMORANDUM**

**Date:** August 29, 2022

**To:** Lewis County Community Development

**From:** Tim Fife, PE, County Engineer

**Subject:** LP22-00002 Sunfisher LCC 16.05.090 Review

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LP22-00002 Sunfisher

a) Improvements Required

This plat is zoned as SMTU. The area is urban in character, the lots are small, and it is not being proposed as a gated private community. Therefore, in accordance with LCC12.60.270(1), it does not meet the criteria for private roads.

All roads within the plat should be built and dedicated to the public. All roads shall be designed and built by developer and approved by Lewis County to meet the requirements of LCC 12.60.

Stormwater will need to be designed and built by developer and approved by Lewis County to meet LCC 15.45. Developer will need to provide plans to WSDOT for approach on to SR12 for their review and approval.

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**Road Maintenance &  
Fleet Services**

476 West Main St.  
Chehalis, WA 98532  
O 360.740.3380  
F 360.740.2741

**Administration, Engineering, Utilities,  
Real Estate Services & Traffic**

2025 NE Kresky Ave.  
Chehalis, WA 98532  
O 360.740.1123  
F 360.740.1479

**Solid Waste Services**

Post Office Box 180  
Centralia, WA 98531  
O 360.740.1451  
F 360.330.7805



b) Easements Required

For public county roads, sixty feet of right-of-way as per RCW 36.86.10 will need to be provided for all public roads. Any right of way necessary to accommodate the stormwater will need to be provided as well.

c) Effect of Subdivision Development on Drainage

An approved Stormwater plan in accordance with LC 15.45 will need to be designed, approved, and constructed.

The Southwest corner of plat appears to be in the Cowlitz River migration zone. Proper warning and/or protection should be provided.

d) Effects of Proposed Subdivision on Public Improvements under PW Jurisdiction

There will not be any effects to Lewis County facilities in the vicinity. Developer will need to get access approval from WSDOT for access to SR12.

e) Accuracy of the Technical Information Submitted

The County Surveyor has provided technical comments in Adept that will need to be addressed.

f) Adequacy of Lot Arrangement and Driveway & Building Access

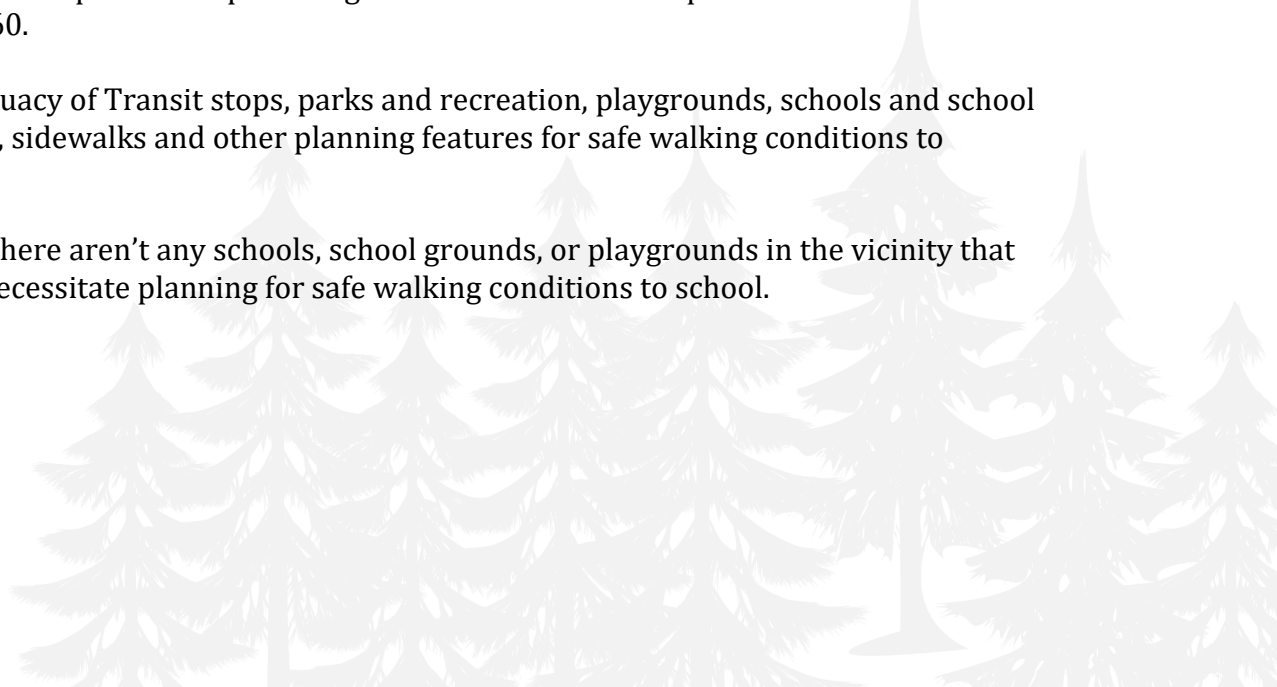
Lot arrangement will need to be adjusted to accommodate sixty feet of right-of-way to provide acceptable access to all lots via public roads. The arrangement shown provides adequate access for private roads.

g) Adequacy of Proposed Public & Private Roadways

Developer will be providing all new construction of public roads that meet LCC 12.60.

h) Adequacy of Transit stops, parks and recreation, playgrounds, schools and school grounds, sidewalks and other planning features for safe walking conditions to school.

There aren't any schools, school grounds, or playgrounds in the vicinity that would necessitate planning for safe walking conditions to school.





## Long Plat Initial Internal Review Comments

File Number: LP22-00002

Date Printed: September 7, 2022

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### Access Review:

- Approval for all access point is through Washington State Department of Transportation (WSDOT). Provide documentation of approved WSDOT access permits. No county roads are proposed to be accessed by this subdivision.

### Survey Review:

- Add the signature block for the planning manager-subdivision administrator.
- Add the signature block for the Health Officer.
- Add the signature block for the Treasurer.
- Remove the signature block for the Board of County Commissioners.
- Verify the bearing between lots 35 and 36, also the distance between lots 26 and 36, 27 and 35.
- Add the northerly dimension between lots 2 and 3 and also verify the distance between lots 1 and 25.
- All individual lot corners will need to be set per LCC 16.05.250
- Please verify that all the written data per LCC 16.05.240(2) is on the face of the map.
- Verify the quarter section listed under the original legal description for both parcels.
- Land division survey map requirements state that original and proposed legal descriptions are to be listed on the face of the map.
- Add the following warnings to the preliminary plat drawing:
  - 1. Lewis County has no responsibility to build, improve, maintain or otherwise service the private roads contained within or providing access to the property described in this subdivision.
  - 2. The approval of this subdivision does not guarantee the issuance of any other permit or approvals.
  - 3. County road right of way shown on this plat is not guaranteed by Lewis County, nor does Lewis County assume any liability for misrepresentation of county road right of way locations, widths and title shown on the plat.
  - 4. Access to this subdivision is not guaranteed by Lewis County.
  - 5. The lots within this subdivision shall not be re-divided for five (5) years from the date of recording without filing for plat, short subdivision, or large lot subdivision as provided in Lewis County code and the future division is consistent with the zoning

in effect at the time of future application.

**Traffic Review:**

- Traffic under the threshold to require a TIA.

**Building Official/ Fire Marshal Review:**

- Each lot shall have 30 feet minimum road frontage, and buildable areas that will meet all required setbacks.
- Each lot shall have its own approved address and lot number
- Private/Public Roads within the proposed plat shall be named and included in the lot addresses. Proposed road names are required to be reviewed and approved before usage
- Each lot shall have approved water and septic
- Access shall be constructed to Lewis County road standards, Road review/Stormwater and Fill and Grade permits required, roads shall be paved, road shall have a private road name.
- The property is located in a SFHA, all future development and buildings shall obtain floodplain development permits and have their own Pre and Post Elevation certificate. Base flood evaluations for each lot are required to be shown on the final plat drawing.
- The 50-foot setback from the Mineral Resource Land (MRL) zoning district shall be shown on the preliminary and final plat drawings.

**Road/Utilities Review:**

- In accordance with 16.05.350 – Fire Protection Standards (4) – requires a minimum of 2 ingress-egress routes for 20 or more lots.
- In accordance with current LC Road Standards (Detail 3-2) when serving 29-45 lots, minimum required easement is 60ft. Entire loop road must have 60ft easement.
- Easement roadway accessing lots 8, 9, 10, 11, and 12 fall within 5-10 lot standard for 40ft minimum easement width.
- Can either extend hammerhead to lot 10 or install access from hammerhead to lot 10 during construction.

**Stormwater Review:**

- Road construction will require stormwater review application and engineered plans per LCC 15.45.

**County Engineer's Review:**

- See attached County Engineer's Report

**Public Health & Social Services – Water Review:**

- Please find comments in Documents

**Public Health & Social Services – Onsite Septic Review:**

- Lots are ok as proposed utilizing engineered/designed on-site septic systems. Notes shall be included as conditions of development.



## MEMO

Date: August 18, 2022

To: Karen Witherspoon

From: Sue Kennedy RS

RE: LP22-00002 "Sunfisher"

**I have reviewed the above subject project and have the following comments:**

**Approved Service Area:**

The proposed subdivision lies within the system's approved service area per the current Lewis County Water District #3 (District) Water System Plan, WSP Update 2018 (WSP).

**Capacity:**

The District's current WSP establishes the system has capacity to serve a total of 785 Equivalent Residential Units (ERUs) or 609 connections. As of August 17, 2022, the system is serving 337 connections and therefore has capacity to serve 272 more connections, assuming they are single-family residences. LP22-00002 "Sunfisher" (Long Plat) proposes a thirty-six lot residential subdivision for which the District has demonstrated a capacity to serve.

**Intent:**

The County is in receipt of thirty-six Water Availability Notices (WANs) signed by the District indicating the system currently has the capacity to serve the Long Plat under specific conditions. The conditions include:

1. The developer shall install and fund the water main extension, service lines, meters, and any other necessary improvements that safely and reliably extend District services.
2. All water system construction must be built to the District's specifications and inspected by the District or an agreed upon District representative.
3. All necessary fees must be paid including but not limited to purchasing water connections and meters, and meter installation.

It should be noted the purveyor signed WANs do not guarantee a water connection will be available in the future. The signed WANs will expire one year from approval by Lewis County Public Health & Social Services (LCPHSS). The applicant is advised that an actual connection is required at each lot prior to final plat approval.

**Prior to Preliminary Plat Approval:**

1. Water system utility design and construction standards must be compliant with the standards of Lewis County Water District #3, WAC246-290 and approved by the District.
2. Documentation from the District must be submitted affirming the proposed water system expansion and water line easements and construction plans are adequate to serve the subdivision, meet the District requirements and are approved by the Washington State Department of Health.

**Prior to Final Plat Approval:**

1. Final water system expansion construction must be completed including but not limited to water mains, distribution lines, and individual connections.
2. The water system expansion project completion must be approved by the District and the Washington State Department of Health.
3. A water connection for each lot must be ensured through purchase and fees as determined by the District.

