

RECEIVED

By K. Witherspoon at 6:22 am, Jul 30, 2024

July 29, 2024

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

Re: Riverside Subdivision, #LP24-00001
Reply to Request for Additional Information

Dear Ms. Witherspoon:

This letter is in response to your request for additional information letter, dated July 19, 2024.

Fire District #10

In your letter, you state that "fire flow is needed". Per LCC 8.55.040, "'Fire flow' means the maximum rate and duration of water flow needed to suppress a fire...". Fire flow is typically provided through fire hydrants or fire sprinkler systems which provide a specific amount of water flow, at a specific pressure, over a specific timeframe. Per Doyle Sanford, this proposed rural project is exempt from "fire flow" and Fire Chief Goble is not requiring "fire flow". Per discussions and meetings with Chief Goble, he is specifically requesting a 2,000-gallon storage tank and a draft hydrant be provided to be used to fill the fire department's tender trucks from, as needed. The recently submitted Group B water system design plans include these requested items.

I respectfully request that the term "fire flow" not be used as I think it's important to be clear that fire suppression items such as fire hydrants, fire sprinkler systems, etc. are not required.

In Chief Goble's Adequate Public Facilities Form, he mentions that a backup generator be provided for the water system; otherwise, the fire district may not be able to guarantee a response. Is the backup generator a requirement or a suggestion? The tender trucks would be able to pull water from the storage tank regardless of whether the power is on or off as the tender trucks have an on-board pump that they pump water out of the storage tank from and it will take quite a bit of time to refill the tank after it has been drained. Therefore, a backup generator would not be beneficial for emergency use.

I respectfully request that a backup generator not be required.

Public Works

Public Works is requiring Riverside Dr. to be improved to two 11' paved lanes with 1' paved shoulders (total 24' paved width), with 0.4' HMA, 0.3' crushed surfacing top course (CSTC), and 1.0' crushed surfacing base course (CSBC). Can you please provide a code reference for this roadway standard as I cannot find that specific standard in LCC 12.60? The closest road standard to these requested specifications would be the "Urban Road Section" which requires only 11' lanes with 0.30' HMA, 0.20' CSTC, and 0.80' CSBC.

Approximately 36% of Riverside Dr. has an existing paved width exceeding 22' and the remainder has a paved width of 20' with ±2' wide gravel shoulders per the topographic survey prepared by the project surveyor. I confirmed these widths with a tape measure. The ±200' long Riverside Dr. currently serves three existing homes. With the addition of 9 proposed lots, this brings the total to 12. With the number

of lots being served, I consider this stretch of Riverside Dr. to be much more "rural" than "urban" and, per the Rural Road Section standard, 20' of pavement width with 1' wide shoulders would be required. The existing road section exceeds the rural standards. I do not believe the urban road standard would provide for any additional public safety.

Comment c) the July 16, 2024 memo. from Public Works mentions that "*an unpermitted road appears to have been constructed on site beyond the limits of the approved road approach, RA23-00367*". Please note that this driveway was installed for a well drilling rig to access the well site as a drilled well and water well report were required for the preliminary subdivision application. Additionally, a driveway was shown on the approved MSR22-0201 site plan. Therefore, this driveway is not "unpermitted".

Comment c) also mentions that existing drainage patterns have been disturbed and stormwater runoff has been redirected onto county right-of-way (ROW). Culverts were installed in an existing ditch, located on private property, beneath the driveway; therefore, no drainage patterns have been changed here. A 30' long stretch of gravel and dirt off the north end of the Riverside ROW sloped back towards the ROW. This material was simply removed and replaced with a driveway cut and this resulted in no additional or new runoff to the ROW. Therefore, there are no pre-existing flow paths to restore.

I respectfully request the above public works conditions/comments be revised and/or removed accordingly.

Building Official / Fire Marshal

LCC 15.35.320(1) was referenced in bullet point #4, under "Building Official / Fire Marshal"; however, I believe this may have been an error. Was the intent to reference LCC 15.350.230(1), regarding "Subdivision Proposals"? Also, the Building Official's comment states that the access "should" be off Cannon; however, your letter states that a redesign is required. As discussed below, the Building Official previously stated that access off Riverside Dr. was acceptable; therefore, I believe "should" is a recommendation and not a requirement.

Assuming it was intended to reference LCC 15.350.230(1) and a redesign is being required, I offer the following:

In e-mail correspondence with the Building Official, Doyle Sanford, in June 2023 (see attached), Mr. Sanford stated "*You may propose the road as pictured as it is not close to the floodway, fill and grade work up to 499 cu. yds may be placed in a floodplain without an H&H study. You will need a Master site review, floodplain development and fill and grade permit for construction of the road.*".

I also had an e-mail exchange (within the same e-mail thread with Mr. Sanford) with Geoff Soderquist, County Engineer, in August 2023 (see attached), and Mr. Soderquist stated "*I support the road coming off the lesser road, Riverside Dr...*" and he suggested that the road be elevated above the floodplain elevation, presumably for better emergency vehicle access. In the same e-mail thread, someone from Public Works stated "*If it is determined that they can't reasonably access the entire parcel from Riverside, then they may need to have an approach from Cannon Rd as well*".

Based on this feedback from county staff, I subsequently submitted a pre-submission application, on behalf of the previous owner's, showing the proposed access off Riverside Dr. During the pre-submission meeting in August 2023, county staff made no mention of a different access point being required nor did the subsequent meeting notes provided by the county mention any revisions to the access point being required. In fact, the county's pre-submission notes state "Emergency access road is okay in a flood zone".

I then had the necessary plans, reports, studies, etc. completed as needed to submit a complete preliminary land division application.

Per LCC 15.35.020, the purpose of the "Flood Damage Prevention" chapter is to *"promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions..."*. The majority of this section of code speaks to the protection of structures, not roadways. Roadways requiring fill within the special flood hazard area (SFHA) may increase the flood height, possibly increasing the risk of damaging structures; however, per LCC 15.35.190 (and as also mentioned by Mr. Sanford in his attached e-mail), *"up to 500 cubic yards of permitted fill may be placed outside of the mapped floodway... without complying with the above standard"*. The "above standard" is providing a study (presumably the "H&H" study mentioned in Mr. Sanford's e-mail) that demonstrates compliance with not increasing the flood level by more than one foot. Put simply, a project can place up to 500 cy of fill within an SFHA without providing any studies.

LCC 15.35.230(1) does not prohibit a roadway from being located within an SFHA. There are many newer roads throughout Lewis County that are located within an SFHA, including in the Packwood area. The proposed lots have been clustered to provide for buildable areas outside of the SFHA and driveway accesses to the buildable areas are outside of the SFHA as well, which meets the intent of LCC 15.35.020. Additionally, the proposed roadway is located outside of the critical areas and their associated buffers (e.g. wetland, stream buffer), and as mentioned above, it will require less than 500 cy of fill.

Per LLC 12.60.640(a), *"Access to a county road shall be limited to one road approach connected to the lowest classified roadway"*. Riverside Dr. is the lower classified roadway. This was mentioned a couple of times in the e-mail correspondence with county staff. This is for public safety.

In order to meet intersection sight distance requirements for an access off Cannon Rd., mature Douglass fir trees and dense vegetation would need to be removed for an approximate total length of up to 725' along Cannon Rd. As shown on the preliminary land division map, a "25' vegetation retention easement" is proposed along Cannon Rd. to provide for a natural vegetated visual and sound buffer between the project and Cannon Rd.

Cannon Rd. sits approximately 13' higher in elevation than the subject parcel. An access off Cannon Rd. would require approximately 3,600 cy of fill; it would take up approximately 13,900 sf of land area (not including what would be needed for associated stormwater facilities); and it would create a safety hazard due to the tall side slopes and steep road grade, especially during the winter. This would create an undue and unnecessary hardship and a safety hazard. Additionally, a Cannon Rd. access would push the proposed development area closer to the SFHA and critical areas.

As stated above, the recently constructed driveway within the SFHA was permitted. I understand that it was not approved for a subdivision; however, approximately 80% of the proposed private roadway within the SFHA falls within the same footprint as the existing driveway. The bulk of the impact already exists and it would require minimal additional impact to meet the county private road standard.

As a side note, I do not believe a private roadway is required to be elevated above the 100-year flood elevation. LCC 15.35.300 appears to be the only section of code that would require it, but that requirement is for "critical facilities" (e.g. schools, hospitals). However, in order to provide for better emergency services access to the future homes, we are proposing the roadway be elevated.

I have been involved in land development projects for almost 30-years as a licensed Professional Engineer. In my professional opinion, Riverside Dr. was stubbed to the subject undeveloped parcel with the intent of future extension. In a discussion with the project surveyor, Bruce Studeman, PLS, he agreed.

Ms. Witherspoon
7/29/24
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As currently proposed, the private roadway accesses off the lower classified county roadway; the roadway will be elevated above the 100-year flood elevation for emergency vehicle access; the roadway will require less than 500 cy of fill material within the SFHA (no study required); buildable areas and lot accesses are being provided outside of the SFHA; and a Flood Development Permit Application was submitted with the preliminary land division application materials.

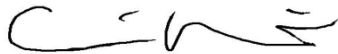
The proposed Riverside Dr. access is in the best interest of public safety; it minimizes access points along Cannon Rd.; it provides for better maintainability; it doesn't create an undue hardship; and it retains the rural character of the surrounding area.

I respectfully request the Riverside Dr. access point remain as currently proposed.

I have reviewed all other comments, I have no questions or comments on those comments at this time, and I understand they will become conditions of final plat approval.

If you have any questions or additional comments, please call me at (360) 705-2474 or e-mail me at chris@olyeng.com. Thank you.

Sincerely,



Chris Merritt, Managing Member
Merrlawski Investments, LLC
PO Box 562
Packwood, WA 98361

Encl: E-mails with Lewis County Staff

From: [Chris Merritt](#)
To: ["Doyle Sanford"](#); ["Lee Napier"](#)
Subject: RE: Residential Subdivision Access Question
Date: Thursday, June 8, 2023 1:59:00 PM

Thanks Doyle.

Chris

From: Doyle Sanford <Doyle.Sanford@lewiscountywa.gov>
Sent: Thursday, June 8, 2023 1:54 PM
To: Chris Merritt <chris@olyeng.com>; Lee Napier <Lee.Napier@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Chris,

You may propose the road as pictured as it is not close to the floodway, fill and grade work up to 499 cu. yds may be placed in a floodplain without an H&H study. You will need a Master site review, floodplain development and fill and grade permit for the construction of the road. The road shall be designed for the number of lots being served.

Thank You.

Doyle Sanford, CFM
Building Official / Fire Marshal
Lewis County, WA
(360)740-2696

Safety is no accident

From: Chris Merritt <chris@olyeng.com>
Sent: Thursday, June 8, 2023 12:58 PM
To: Lee Napier <Lee.Napier@lewiscountywa.gov>
Cc: Doyle Sanford <Doyle.Sanford@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Hi Lee and Doyle. I'm just following up on this.

Thank you!

Chris

From: Chris Merritt <chris@olyeng.com>
Sent: Monday, June 5, 2023 2:01 PM
To: 'Lee Napier' <Lee.Napier@lewiscountywa.gov>
Cc: 'Doyle Sanford' <Doyle.Sanford@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Hi Lee. I just noticed that the subject parcel does not have frontage along Cannon Rd. (per county parcel map and a discussion with the surveyor). However, the owner is contemplating a BLA to possibly revise the lot lines between his three parcels prior to selling the parcels. We're not sure what the resultant lot lines will look like yet (or they may just remain as-is) so the map I previously sent you (see attached) is not current/correct.

So, it would still be good to know if the county would allow access off Riverside Dr. in case the parcel ends up having some Cannon Rd. frontage. The roadway could be installed more or less at-grade through the 100-year flood plain area to minimize fill in this area.

I think we would need to submit an SSDP for the portion of road within the shoreline jurisdiction and a flood plain development permit for the portion outside of the shoreline. Any future development/subdivision would have the buildable areas outside of the shoreline jurisdiction and flood plain so we should be good there.

Hopefully I'll hear back from you and/or Doyle by tomorrow (Tuesday) afternoon but I realize that timeline is tight!

Thanks,

Chris

From: Chris Merritt <chris@olyeng.com>
Sent: Thursday, June 1, 2023 2:07 PM
To: 'Lee Napier' <Lee.Napier@lewiscountywa.gov>
Cc: 'Doyle Sanford' <Doyle.Sanford@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Hi Lee. Congrats to Garry! He was always great to work with. Has someone filled his position?

I know it's last minute but by Tuesday would be great if at all possible as I have a meeting with the owner late Tuesday afternoon and we're getting other consultants lined up but their scope somewhat depends on the required access point.

If it would be helpful I can try to take a photo of the drop down off Cannon Rd. as it may give a better indication of how tough that access point would be. I can see why Riverside Dr. was stubbed

to this parcel after seeing it in person.

I should have clarified that the proposed roadway extension off Riverside Dr. would not occur within any critical area buffers but a portion of it would fall within the 200' shoreline jurisdiction of the Cowlitz River. "Residential Development" is a permitted use per the SMP so I think this would be okay with an SSDP.

Thanks!

Chris

From: Lee Napier <Lee.Napier@lewiscountywa.gov>
Sent: Thursday, June 1, 2023 1:41 PM
To: Chris Merritt <chris@olyeng.com>
Cc: Garry Scott <garry.scott@lewiscountywa.gov>; Doyle Sanford <Doyle.Sanford@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Hi Chris,

I've received your message. Doyle is out the remainder of the week. Garry no longer works (retired) for Lewis County. Someone will get back to you next week. I hope that timeline works for your request.

Lee

From: Chris Merritt <chris@olyeng.com>
Sent: Thursday, June 1, 2023 12:52 PM
To: Lee Napier <Lee.Napier@lewiscountywa.gov>
Cc: Garry Scott <garry.scott@lewiscountywa.gov>; Doyle Sanford <Doyle.Sanford@lewiscountywa.gov>
Subject: Residential Subdivision Access Question

Hi Lee. I'm not sure who best to ask so I copied Garry and Doyle on this e-mail. I'm working on a potential residential subdivision in Packwood, off Cannon Rd. (see attached map). The parcel has frontage along Cannon Rd. on the northerly side and an existing county road, Riverside Dr., is stubbed to the parcel at the south corner.

Per the county road standards, a project with two road frontages would be required to take access from the lower volume road (Riverside Dr. in this case); however, a potential private roadway extension off Riverside Dr. would partially be within a 100-year floodplain associated with the Cowlitz River.

Aside from the higher traffic volume, the other issue with an access off Cannon Rd. is that Cannon

sits 12' higher in elevation than the subject parcel. Based on some rough numbers, this access wouldn't catch to existing grade until it was about 120-feet into the parcel. Any lots in this area would feel like they're sitting in a hole with this ramped access.

Based on our understanding, Riverside Dr. was intended to be extended to serve the subject parcel. Also, we're trying to cluster the lots outside of the floodplain area and having an access off Cannon Rd. makes this more difficult.

Would it be acceptable to propose a private roadway extension off Riverside Dr. as shown on the attached sketch?

Please let me know if you need anything else.

Thanks,

Chris Merritt, PE



PO Box 12690
Olympia, WA 98508-2690
360.705.2474
www.olyeng.com

External Email - Remember to think before you click!

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

From: [Doyle Sanford](#)
To: [Chris Merritt](#); [Geoff Soderquist](#)
Cc: [Tim Fife](#); [Josh Metcalf](#)
Subject: RE: Residential Subdivision Access Question - SPRC23-008
Date: Monday, August 14, 2023 4:24:21 PM

Chris,

Please provide intermediate culverts in your design to allow for passage of floodwaters.

Thank You.

Doyle Sanford, CFM
Building Official / Fire Marshal
Lewis County, WA
(360)740-2696

Safety is no accident

From: Chris Merritt <chris@olyeng.com>
Sent: Monday, August 14, 2023 3:22 PM
To: Geoff Soderquist <Geoff.Soderquist@lewiscountywa.gov>
Cc: Tim Fife <Tim.Fife@lewiscountywa.gov>; Josh Metcalf <Josh.Metcalf@lewiscountywa.gov>; Doyle Sanford <Doyle.Sanford@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question - SPRC23-008

Some people who received this message don't often get email from chris@olyeng.com. [Learn why this is important](#)

Hi Geoff. I think we're limited to <500 cy of fill within the floodplain to keep things simple. That allows for up to roughly a 1.5' fill height for the road which puts it above the flood plain elevation based on my interpolation of the BFE's and site elevations.

Thanks,

Chris

From: Geoff Soderquist <Geoff.Soderquist@lewiscountywa.gov>
Sent: Monday, August 14, 2023 3:06 PM
To: Chris Merritt <chris@olyeng.com>
Cc: Tim Fife <Tim.Fife@lewiscountywa.gov>; Josh Metcalf <Josh.Metcalf@lewiscountywa.gov>
Subject: Re: Residential Subdivision Access Question - SPRC23-008

I did try to reply through community development. I support the road coming off the lesser road,

Riverside Dr, but I do recommend filling above the 100 year unless providing an alternative access for high water events.

-Geoff Soderquist
Assistant County Engineer

Sent from my phone

From: Chris Merritt <chris@olyeng.com>
Sent: Monday, August 14, 2023 1:08:26 PM
To: Geoff Soderquist <Geoff.Soderquist@lewiscountywa.gov>
Cc: Tim Fife <Tim.Fife@lewiscountywa.gov>; Josh Metcalf <Josh.Metcalf@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question - SPRC23-008

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Hi Geoff. We haven't heard back from you so we will assume the proposed private road access off Riverside Dr. is still acceptable based on past correspondence from both public works and building.

Thanks,

Chris Merritt, PE



PO Box 12690
Olympia, WA 98508-2690
360.705.2474
www.olyeng.com

From: Chris Merritt <chris@olyeng.com>
Sent: Wednesday, August 2, 2023 10:49 AM
To: 'Geoff.Soderquist@lewiscountywa.gov' <Geoff.Soderquist@lewiscountywa.gov>
Cc: 'Doyle Sanford' <Doyle.Sanford@lewiscountywa.gov>; 'Karen Witherspoon' <Karen.Witherspoon@lewiscountywa.gov>; 'Mollie Hurt' <Mollie.Hurt@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question - SPRC23-008

Hi Geoff. I'm just following up on this. Feasibility expires this Friday so we're hoping to get confirmation that the county is still amenable to the access coming in off Riverside Dr.

Thanks,

Chris

From: Chris Merritt <chris@olyeng.com>
Sent: Thursday, July 27, 2023 10:11 AM
To: 'Geoff.Soderquist@lewiscountywa.gov' <Geoff.Soderquist@lewiscountywa.gov>
Cc: 'Doyle Sanford' <Doyle.Sanford@lewiscountywa.gov>; 'Karen Witherspoon' <Karen.Witherspoon@lewiscountywa.gov>
Subject: FW: Residential Subdivision Access Question - SPRC23-008

Good morning Geoff. It was nice to meet you this morning. As a follow-up to the road access point that we discussed, please see the e-mail response from Public Works highlighted in **yellow** below. Also, here is an excerpt from a separate e-mail from Doyle:

Chris,

You may propose the road as pictured as it is not close to the floodway, fill and grade work up to 499 cu. yds may be placed in a floodplain without an H&H study. You will need a Master site review, floodplain development and fill and grade permit for the construction of the road. The road shall be designed for the number of lots being served.

Thank You.

Doyle Sanford, CFM
Building Official / Fire Marshal
Lewis County, WA
(360)740-2696

Both Public Works and Building/Flood were okay with the proposed access off Riverside Dr. However, we're still concerned that the hearing examiner may require the access to be from Cannon to avoid having a road within the 100-year floodplain or to just be further away from the critical areas. As I mentioned at the meeting this morning, county road standards require access to be from the lesser volume/classification road and Cannon Rd. sits about 12' higher (at roughly a 3:1 slope) than the subject parcel, making a reasonable access from Cannon a challenge. The road will also be private with a gate for whatever that's worth.

I know we cannot guess what the hearing examiner may decide, but I do know that county support of the proposal helps out tremendously in their decision.

Does the county still feel comfortable in supporting/defending the proposed access off Riverside Dr.?

Thanks,

Chris Merritt, PE



PO Box 12690
Olympia, WA 98508-2690
360.705.2474
www.olyeng.com

From: Chris Merritt <chris@olyeng.com>
Sent: Friday, June 9, 2023 9:12 AM
To: 'Lee Napier' <Lee.Napier@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Hi Lee. Doyle did respond yesterday stating that access off Riverside was acceptable so I think we are good to go there. We plan to schedule a pre-sub soon but we're trying to iron out this last potential hurdle before spending too much more time and money on it. Would it be okay for me to reach out to Karen to discuss this?

Thanks,

Chris

From: Lee Napier <Lee.Napier@lewiscountywa.gov>
Sent: Friday, June 9, 2023 9:08 AM
To: Chris Merritt <chris@olyeng.com>
Subject: RE: Residential Subdivision Access Question

Chris,

Great questions. However, I am not the technical expert to answer. I would suggest if you have a series of questions to either schedule a pre-sub or if the question is just about shoreline, perhaps the question could be directed to Karen as she would be the subdivision reviewer. Let me know how you'd like to proceed and I will connect you with staff.

Also, Doyle did not answer your initial question "Would it be acceptable to propose a private

roadway extension off Riverside Dr. as shown on the attached sketch” because he understood that you had reconsidered the approach. If he was mistaken, here is the response for Public Works
“Chris Merritt is correct that the County would prefer access to be developed from the lower volume road, Riverside Dr. Since they are proposing a private roadway extension through the 100 year flood plain I think Doyle should give his opinion on it when he returns. If it is determined that they can’t reasonably access the entire parcel from Riverside, then they may need to have an approach from Cannon Rd as well.”

Thank you.

Lee

From: Chris Merritt <chris@olyeng.com>
Sent: Friday, June 9, 2023 8:57 AM
To: Lee Napier <Lee.Napier@lewiscountywa.gov>
Subject: RE: Residential Subdivision Access Question

Good morning Lee. It’s looking like approximately 1,000 sf of private road easement and 120 sf of actual gravel roadway area would encroach into the 200’ shoreline jurisdiction of the Cowlitz. Darn! Per the SMP, clearing/grading and placement of fill for a roadway is a permitted use; however, “residential development” may be exempt from an SSDP.

Since this is very minimal disturbance and it a residential development project, would it be exempt from an SSDP? If not, maybe the county road engineer would allow for a reduced road width for 100’ to keep the actual road out of the shoreline jurisdiction. Or, would the overlapping road easement still be an issue?

Thanks,

Chris

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To: Chris Merritt <chris@olyeng.com>; Lee Napier <Lee.Napier@lewiscountywa.gov>
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Per the county road standards, a project with two road frontages would be required to take access from the lower volume road (Riverside Dr. in this case); however, a potential private roadway extension off Riverside Dr. would partially be within a 100-year floodplain associated with the Cowlitz River.

Aside from the higher traffic volume, the other issue with an access off Cannon Rd. is that Cannon sits 12' higher in elevation than the subject parcel. Based on some rough numbers, this access wouldn't catch to existing grade until it was about 120-feet into the parcel. Any lots in this area would feel like they're sitting in a hole with this ramped access.

Based on our understanding, Riverside Dr. was intended to be extended to serve the subject parcel. Also, we're trying to cluster the lots outside of the floodplain area and having an access off Cannon Rd. makes this more difficult.

Would it be acceptable to propose a private roadway extension off Riverside Dr. as shown on the attached sketch?

Please let me know if you need anything else.

Thanks,

Chris Merritt, PE



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