West Bay Yards Mixed Use / File: 21-2854 PROJECT ADDRESS: 1210 West Bay Drive 1st Round Review Comments – September 3, 2021			
Note: Please type your responses into the column titled *Applicant Response*, and include as much information needed to clearly respond to each comment. Please do not say "comment noted or acknowledged" without providing an explanation; doing so may delay resubmittal. Additionally, please avoid referring to the plans without a sheet number, or explanation of how the plans were revised.			
ITEM	**COMMENT OR REQUESTED REVISION**	**DETAILS**	**APPLICANT RESPONSE**
PLANNING			
1) Site Details – Site Plan	Revision	1. Provide individual site plans for at least engineering phases 1 and 2 with associated buildings. Only show the area and anticipated work for said phase. This may require some consolidation of site work phases and building permit phases as site work phase 1 includes building phases 1 and 5. Provide development standard compliance details for the entire project on the site plan showing the full scale. Each phase (presumably two separate site plans) should also indicate individual development standard compliance. If individual lots are intended to be created, such property lines should be shown on the site plan. 2. Each phase will need to include calculations for code compliance individually per the development agreement 3. Buildings should be numbered to reflect their numbering in the development agreement rather than the number formatting shown on the plan. 4. Clarify building coverage calculations. Land waterward of the existing Ordinary High Water Mark (OHWM) should be excluded from the base parcel size for calculating coverage. Identify areas being included in building coverage. It is unclear how the structured parking, accessory structures, large awnings, or terraced landscaping walls are being calculated. Are they included or excluded? Consider providing a diagram or other method to show compliance. Please clarify/revise building coverage calculation.	1. See revised architectural site plans sheets A100.1 and A100.2 and revised engineering sheets SP-01 and SP-02. 2. See revised architectural site plans sheets A100.1 and A100.2 3. See revised building numbering on sheets A100, A100.1, and A100.2 4. See building coverage calculations sheets A100, A100.1, and A100.2. Building coverage includes footprint of buildings at plaza level including any large awnings, Landscaping and parking elements are not included in building coverage calculations.
2) Site Layout	Revision	1. Pedestrian routes need to be clearly identified on plans particularly where the pedestrian route appears to be combined with the vehicular lane of travel on the north and south sides of the parking garage structure. Create a pedestrian route plan 2. Clarify intent of the ornamental fencing around buildings. How will this impact public access? Will there be gates? Provide detail to show heights etc.	1. See additional sheet A100.3 for pedestrian route information 2. See additional sheet A100.3 for fence detail. Locations and areas with 42" guard rails for fall protection as required for pedestrian safety.
3) Shoreline – View Analysis OMC 18.20.500-507	Revision	Separate the Visual Impact Assessment from the Shoreline Narrative and include the View Analysis so that there is one individual view analysis and revise as follows: 1. Images provided in the View Analysis should be revised to include additional view locations, and include the anticipated vegetation planted in VCA to better articulate the anticipated view blockage along the promenade or other view areas. Add low growth veg to renderings 2. Assessment must include additional detail: o Provide additional detail on existing views and how those views might be affected by both a 35' tall building and a 65' tall building. Identify differences. Provide imagery to assist in comparison. Illustrate difference in view – building lines o Identify what overriding considerations of public interest will be served by the project, as such a finding is required to be made prior to approving increased height (OMC 18.20.504 and RCW 90.58.320). ?? o OMC 18.20.504.B requires compliance with OMC 18.110.060 (Basic Commercial Design – View Preservation). Identify existing views from the property of Mt. Rainer, The Olympic Mounts, Budd Inlet, Capitol Building and Capitol Lake. Indicate view points and then address how these views will be impacted from the existing and proposed ROW (promenade). Identify what the project has done to reserve a reasonable portion of such territorial and immediate views for a significant number of people from the ROW. Ensure the proposed measures for view access are permitted within the SMP. o Identify all measures being used to protect views. The code lists several, such as maintaining open space between buildings, clustering buildings, minimizing height of buildings, etc. This list is not exhaustive and other elements can be identified if applicable. Plans provided indicate consideration of views through view corridors and public access, but the analysis needs to address what specifically was done to account for views for this proposal and how these efforts have achieved the requirements of the code. Clear indication of what areas will be available to the public, if there will be limitations on hours, amenities for use etc. will help clarify the availability of views being preserved. 3. Address how views are likely to be impacted by proposed improvements such as awnings, covered bicycle parking, trees at maturity, etc. 4. Consider addressing height bonus criteria with the View Impact Study as height and views are intrinsically tied.	1. See updated View Study Narrative 2. See updated View Study Narrative 3. See updated View Study Narrative 4. See updated View Study Narrative
4) Height – OMC 18.06.100.2.c	Revision	1. Revise View Impact Study to address: a. Address public and private views to Budd Inlet from the Hillside and public views from the street level along West Bay Drive.	1. See updated view study sheets A105 and A106

		b. Identify any view blockages within the proposed view corridors such as awnings, trees, accessory structures etc. c. Provide separate diagram indicating how the view blockage percentage was calculated. Show the parcel width at West Bay Drive, show the precise dimension of each building and each corridor. Indicate the area within 45 degrees and 90 degrees* of the MHWL and West Bay Drive so that the precise boundaries of the corridor can be identified. Show intrusions. 2. Indicate on plans the area of Right of Way (ROW) dedication associated with the waterfront the size of the proposed park. a. Note – Shoreline Narrative indicates the public benefitting amenity is the waterfront trail and expanded waterfront trail rather than expanded waterfront trail and park as identified in the view analysis diagram – Please clarify and update accordingly. 3. Provide the requisite analysis of recreational needs / amenities to be provided as outlined in OMC 18.06.100c.iv 4. Provide a diagram indicating how height is being calculated. Show the points at which grade is being measured. Note: According to OMC 18.20.120 height (of Structure): The difference between the average grade level and the highest point of a structure (not including temporary construction equipment); provided, that television antennas, chimneys, and similar appurtenances shall not be used in calculating height except where such appurtenances obstruct the view of the shoreline from a substantial number of residences on areas adjoining such shorelines. 5. Identify any appurtenances anticipated on top of the buildings that might impact views.	2. See revised site plan A100 for hatched area noting 24' ROW. 3. Per OMC 10.06.100c.iv an enhanced Trail network is provided. Additional viewing platforms, seat walls, play area, water access and kayak launch are provided for recreational needs. See included Project Narrative. 4. See sheets 301-310 Noting max height as measured for plaza grade level. 5. Elevator overrides are shown on elevations. No further apparatus are anticipated.
5) Shoreline - Location of Ordinary High Water Mark	Revision / Additional info	Demonstrate compliance with RCW 90.58.030 related to the determination of the OHWM and how it is reflected on plans. It appears that future anticipated location post restoration is being used rather than the existing mark, which does not appear consistent with code. According to RCW 90.58.030 the "OHWM is mark that will be found by examining the…banks and ascertaining where the presence and actions of water are so common and usual and so long continued in all ordinary years as to create a mark upon the soil a character distinct from that of the abutting upland…". Based on this definition, the existing location is the appropriate point to measure from for the Vegetation Conservation Area (VCA), shoreline setbacks, 100' distance for mixed use etc. Future development constructed after the OHWM has been relocated could use the new location when identifiable at that time.	See included Applicant's Response to Legal Issues in 1st Substantive Review. Section C
6) Shoreline – No Net Loss	Revision / Additional info	Revise analysis to address the details of the project and to be more specific generally. When conclusions are drawn, such as an action will not cause net loss, identify the scientific documents/reports being used to support conclusions within the No Net Loss (NNL) Narrative. More detail is needed, particularly around the following topics: 1. Address ecosystem wide processes. Address the project proposal and how it is known that it will beneficially impact to sediment transport, littoral drift, habitats and species etc. within the near shore and aquatic vicinity. 2. Address the conversion of aquatic land to terrestrial land. Please clarify how this does or does not contribute to a net loss of shoreline and if a loss of shoreline area; how is that loss being addressed/ compensated? 3. Address impacts from site lighting on the shoreline environment. Project plans show several pathways, viewing platforms, pedestrian areas, etc. that are likely to be lit. Similarly, building lighting of 65' tall is likely to have potential impacts to the existing shoreline functions. 4. Address all proposed structures within the shoreline setback and Vegetation Conservation Area. 5. Address any and all utilities within the VCA or shoreline environment and address potential impacts to shoreline function OMC 18.20.710. 6. Address all restoration work proposed including removal of wood, concrete, debris on the beach etc. 7. Note, other sections (below) may indicate a need for additional analysis related to NNL as well.	See Attachment M: Preliminary Engineering Design Report, West Bay Yards, March 2022, Moffatt & Nichol, Seattle, WA and Attachment P: West Bay No Net Loss and Mitigation Sequencing, March 2022, Grette and Associates,Tacoma, Washington
7) Shoreline Mitigation	Revision / Additional info	Provide a Mitigation Plan as outlined in OMC 18.20.410.f and OMC 18.32.136 for both the VCA and aquatic restoration work proposed. While the Shoreline Narrative indicates the restoration work is voluntary, this does not exempt the work from providing a detailed mitigation plan. Elements from the Mitigation Sequencing Narrative should be used and expanded upon to prepare the full mitigation plan. The Mitigation Plan will need to address measurable, specific criteria for evaluating success of the proposed goals and objectives and it needs to evaluate impacts on and offsite. The mitigation plan must address items such as construction sequencing, flooding and impacts to plant selection, habitats in the vicinity, how the proposed plant community will grow and mature over time, and it must provide a contingency plan with monitoring of 10 years or more. Use of existing environmental documents is necessary. The document can draw from a variety of resources such as the Cumulative Impact Assessment of 2013, Shoreline Inventory of 2009, Shoreline Analysis and Characterization Report 2008, Shoreline Restoration Plan of 2012, Budd Inlet Restoration and Conservation Planning by the Squaxin Island Tribe of 2010. If citing these (or other) documents, identify what section is being cited and be clear about the specific environmental impacts the document addresses. The document should address the following types of information: 1. Provide clarity as to what type of modifications are anticipated for the existing rip-rap sea wall and bulkhead onsite. Different plan sets provide an unclear picture of the proposal. Designs show a rock revetment, groin, repair / replacement of existing rip-rap where it has fallen, significant removal of debris on tidelands etc. All of this work needs to be addressed in detail. 2. How stable is the existing sea wall, and rep-rap and soil behind and how does that impact the proposals design? 3. Furter information regarding the stormwater outfalls is needed. To what extent will the three outfalls being retained need to be replaced/ modified? How will this work impact the existing shoreline armoring and how has the project been designed to minimize impacts? Plans show new splash pads, in the aquatic environment; please address. 4. Additional detail regarding critical habitats is needed in association with the restoration and planting in the VCA. For example, narratives indicate the VCA has been designed to provide perching and foraging for raptors, but analysis regarding the type of raptors being served does not appear to be provided. Use of the Habitat Assessment would benefit this analysis. Similarly, addressing other shorebirds and habitats known to be in the vicinity is appropriate. How does the proposal impact them in the short term and long term?	See Attachment Q: West Bay Restoration Mitigation Plan, March 2022, Grette and Associates,Tacoma, Washington

		5. Check for mis-labeling of the West Bay Environmental Restoration Assessment, it is referred to as a restoration report or plan in various locations within the submittal materials, which could be misleading to the reader. This document is an assessment of possible restoration locations, rather than an approved restoration plan/report. 6. The quantity and location of fill needs to be carefully addressed. Evaluation of cutting into the existing fill, and less fill needs to be thoroughly evaluated as does removal of existing shoreline armoring or conversion to soft armoring methods. The analysis provided indicates the restoration, as proposed, is consistent with the City's 2012 Restoration Plan for Budd Inlet, however that document identifies fill removal along the nearshore as a potential restoration method to occur with redevelopment to provide transition habitat and improve water quality (item 27 on page 29). The map on page 30 shows item 27 (fill removal) in association with this site and indicates an anticipation of such work to be completed within 10 years of the plans adoption. While restoration at this site is consistent with the 2012 Restoration Plan, further clarity as to how additional fill rather than fill removal is supported by the plan. 7. Address site lighting and how the site has been designed to minimize impacts associated with lighting, especially along the VCA and restoration area. LANGUAGE ABOUT DARK SY CUT OFF LIGHTING, PATHWAY LIGHTING TO NOT POLLUTE SHORELINE ETC. 8. Address any and all utilities in the VCA or shoreline environment including stormwater outfalls. Identify how mitigation sequencing was used to minimize their presence on the shoreline. OMC 18.20.710	
8) Shoreline – Modification OMC 18.20.833	Revision / Additional info	It is unclear to what extent shoreline modification is anticipated for the project scope. Please be aware that according to OMC 18.20.800 shoreline modifications are structures or actions that permanently change the physical configuration or quality of the shoreline, particularly at the point where land and water meet. Shoreline modifications include, but are not limited to structures such as dikes, breakwaters, piers, docks, weirs, dredge basins, fill, bulkheads, or other actions. While the Shoreline Narrative indicates no new hard armoring is proposed, other documents indicate repair, replacement, and new armoring is likely or proposed. New hard armoring would trigger a Shoreline Conditional Use Permit as would a breakwater, jetty, groin or weir. Repair, maintenance, and soft armoring are permitted provided the criteria of approval are met. Please clarify the project proposal to indicate which, if any of these features are proposed and address the code criteria for them as applicable. If shoreline armoring is proposed, associated with the restoration or for to support the construction project, the geotechnical report must address the proposal and provide clear recommendations related to the various elements such as erosion, sediment transport, long-term stability of the existing sea wall.	The goal of the proposed changes to the shoreline is aquatic habitat restoration, enhancement, and establishment. The proposed changes include restoration and enhancement of existing armored shoreline to more natural conditions that could support establishment of marsh and riparian areas by placement of more natural beach fill (mixed sand and gravel material) seaward of the existing armored shoreline. The existing riprap along the shoreline will not be removed prior to fill placement, rather buried with more natural beach substrate which will provide benefits and meet criteria of approval as outlined in the Shoreline Consistency Narrative – Shoreland Fill (OMC 18.20.833) and Fill Waterward of Ordinary High Water Mark (OMC 18.20.837). The proposed changes to the shoreline do NOT include any large structures such as dikes, breakwater, piers, docks, weirs, or bulkheads. No new hard shoreline armoring is proposed as part of this project.[SM1]
9) Shoreline - Fill	Revision / Additional info	The proposed fill must meet all criteria of OMC 18.20.033/037 and the Comprehensive Plan Goals and Policies. The shoreline narrative provides general discussion of how these criteria have been addressed, but the analysis lacks detail. Further study supported by a geotechnical report is needed to demonstrate the proposal is the minimum necessary will not require new hard armoring to protect materials placed, the anticipated movement and erosion or sedimentation transport of the affected area. Further clarity as to why fill removal is not viable is needed. The fill must be addressed in the restoration and mitigation report. Address any potential impacts to the navigation channel.	See Attachment M: Preliminary Engineering Design Report, West Bay Yards, March 2022, Moffatt & Nichol, Seattle, WA
10) Shoreline Restoration and Enhancement OMC 18.20.855	Revision / Additional info	A restoration plan is required and must comply with applicable code requirements. The SMP Restoration Plan identifies this area as an area that would potentially benefit from restoration, similarly the West Bay Redevelopment Assessment document indicates a preference for restoration in this area, and both documents are intended to identify potential restoration sites. Neither provide the necessary scientific analysis for specific restoration approaches. Detailed analysis of the proposed approach and its merits are needed prior to approval. The restoration plan will need to demonstrate that the project meets all applicable code criteria and provides an ecological benefit in order to be approved by the City and Department of Ecology. Please ensure the restoration plan specifically addresses the following: 1. The plan must address sediment generation and transport, water quality, large woody debris, overwater structures, in-water structures etc. and must use and identify Best Available Science and Best Management Practices being implemented. It must clearly identify all aspects of the proposal, maintenance and the minimization over time of needed maintenance. In order to meet code, the plan must clearly demonstrate that the restoration is not extending waterward more than the minimum necessary to achieve the intended result. 2. The plan must address creation of upland areas as the code establishes that restoration work shall not result in the creation of additional upland area. While addressed in the Shoreline Narrative, further clarity is needed. The Narrative indicates that the building setback is exceeded therefore upland areas are not	1. See the Restoration and Mitigation Plan section 4.3.1. 2. See Attachment Q: West Bay Restoration Mitigation Plan, March 2022, Grette and Associates,Tacoma, Washington 3. See Attachment Q: West Bay Restoration Mitigation Plan, March 2022, Grette and Associates,Tacoma, Washington 4. The upland development and shoreline restoration action are entirely located within private property; therefore, no coordination with WDNR is necessary. While the minimum

		needed for the development. What is left unaddressed is that the VCA, trails, and other amenities are proposed on the land being created by the fill. It is unclear how the project complies with the criteria as proposed. 3. The report will need to address avoidance of use of shoreline stabilization methods. If necessary, bioengineering rather than other shoreline stabilization is preferred. This should also be addressed in the mitigation report. 4. It is likely that the additional fill will require permission from WADNR, coordination is warranted to determine if such approval is likely. Similarly the Port has a vested interest in the shipping lanes. Please be sure to coordinate with them as well in preparing this report. 5. Provide an erosion energetics report to estimate the lifespan of imported fill on the beach as requested by WDFW. 6. Address sea level rise and how this project will be impacted by potential changes to sea level in short and long term. 7. Include appropriate information related to cultural resources, such as the deep testing using requested by the Squaxin Tribe's letter.	distance between the subject parcel and the western boundary of the federal navigation channel is 640 feet, appropriate coordination with the Port of Olympia will occur. 5. Attachment M: Preliminary Engineering Design Report, West Bay Yards, March 2022, Moffatt & Nichol, Seattle, WA 6. Attachment M: Preliminary Engineering Design Report, West Bay Yards, March 2022, Moffatt & Nichol, Seattle, WA 7. See Attachment C – Cultural Resource Desktop Review and Monitoring and Inadvertent Discovery Plan, West Bay Yards
11) Shoreline – Misc.	Revision / Additional Info	1. Parking: Provide information on how the at grade structured parking along the shoreline will be designed to minimize visual impacts to the VCA and pedestrian pathways. Plans appear to show a pony wall and vegetative screening. Please indicate how headlights will not unduly trespass into the natural environment. 2. Public Access (OMC 18.20.450): a. Revise plans to show the shoreline trail as dedicated as ROW. Note that this will bifurcate the existing site, setting the VCA on the waterward side of the ROW. The VCA and restoration area are required to be set aside as a tract if any land division is proposed, otherwise the VCA must be set aside through other legal means. As a Boundary Line Adjustment or other subdivision is likely to be submitted with this project, the City assumes the VCA will be set aside as a tract. Both the ROW dedication and Tract should be shown on revised plans. b. Show anticipated fencing for restoration / VCA. c. Clarify what areas are intended to be available to the public and to what extent. Various narratives and materials indicate the 22' wide trail will be available to the public and ADA accessible, but the accessible route is not defined. Since the trail is required to be dedicated as ROW, access would likely be 24/7. It is unclear if the accessible route will be provided within the ROW or through the building. It is also unclear if any of the amenities at the plaza level will be for public access and to what extent. Plans include fencing along the plaza at several locations, which appears to impede access to the plaza to some extent. Similarly, it is unclear if the beach stairs / physical access to the shoreline is intended to be limited and if so to what extent? Clarity regarding what specifically is intended to be available to the public and to what extent is needed. 3. 18.20.652 Boating facilities / 18.20.652 Launch Ramps / 18.20.656 Boat Storage: a. It is unclear how the kayak launching area is intended to be used or designed. Is it a pedestrian access to the shoreline or an area intended to be used for launching, storing, using kayaks and other small watercraft? Is it a public use facility or private? Is boat storage or rental intended to be included as retail space? Please clarify. If intended for any of these uses, please be sure to address applicable code criteria related to boating and launching and no net loss. 4. Clarify width of pathway along the shoreline, various plans show different widths ranging from 18'-24'. 5. JARPA application form appears to be missing content: a. Question 6.a. The response is broken into upland site development and shoreline restoration, but nothing is written under shoreline restoration. b. Question 6.e asks for specific construction methods to be used and identification of areas within the 100-year floodplain. Upland work appears to be adequately addressed, but restoration work is somewhat vague and does not address many elements shown in the attachments. c. Question 8.g asks about excavations. The response should include any excavations necessary to remove existing relic concrete structures, piles and other debris below the OHWM identified to be removed in the project plans. 6. Project is located in two Shoreline Environmental Designations (SED's). The upland portion of the project is in the Urban Intensity Designation and all work waterward of the OHWM is in the Aquatic designation. Both have distinctly different development regulations identify each and the associated requirements as applicable.	1.-Plaza level parking is located below buildings and screened with vegetation to minimize visual impact. Due to grade change from shoreline trail to plaza level no parking is visible by pedestrians along the esplanade. 2.-See updated Site Plan sheet A100 and sheet A100.3 pedestrian plan for information. 3.-See landscape plans for design and location of publicly accessible kayak launch. 4.-R.O.W width is 24' which contains a meandering esplanade of varying widths 5. -See revised JARPA. 6. -See the Shoreline Consistency Narrative – Shoreline Environmental Purposes (OMC 18.20.330) section.
12) Shoreline – Residential Development OMC 18.20.690.b	Revision / Additional info	1. Identify how the proposed development has been designed to control erosion and impacts to slope stability and avoid the use of shoreline armoring at the time of construction and in the future. Project plans appear to rely on the existing shoreline armoring for stability. It is unclear to what extent this armoring will be disturbed during the course of construction and restoration work. Plans do not indicate longevity of the existing armoring. All armoring proposed must be addressed and supported by the geotechnical report.	See Attachment M: Preliminary Engineering Design Report, West Bay Yards, March 2022, Moffatt & Nichol, Seattle, WA
13) Vegetation Conservation Areas	Revision / Additional info	1. The Mitigation Plan must address VCA because of the need to restore it when in a degraded function as is the case. 2. Utilities and other similar features are not permitted within the VCA. Show the extent of VCA on applicable civil plan sheets, and remove water, stormwater, and other utilities from the VCA. Minor intrusions such as stormwater outfalls can be allowed when no viable alternative is available and the impact is compensated (see below).	

OMC 18.20.492-18.20.496		3. Pedestrian Features (pads/picnic shelters etc.) within the VCA are limited as follows: a. Features within a Park: 400 square feet per feature (18.20.493.11). Other accessory structures in the VCA must comply with OMC 18.20.690.c. Residential Development, which limit the total amount of features to 400sf. b. Features outside a park: A single waterfront deck not exceeding 400sf per parcel, must be made of pervious materials, setback more than 5' from the OHWM, no more than 2' above grade, and not covered. Please revise plans by more clearly identifying areas intended to be dedicated as parks or ROW, and by reducing the amount of amenities within the VCA to no more than 400sf per parcel. 4. Pedestrian Promenade: While a pathway is permitted within the VCA, the pathway shown will likely need to be revised as follows: a. The VCA can be reduced in width by no more than 50%, and only when such reduction is compensated by an equal or greater increase in VCA elsewhere onsite. It is unclear where the VCA is increased in width to compensate for the intrusion into the VCA. OMC 18.20.495.b b. Impervious surfaces within the VCA cannot exceed 25%. Please provide calculations. c. Pathway and other non-vegetation features cannot exceed 33% of the VCA, please provide calculations. d. All reductions of the VCA must be replaced with equal VCA increases – see item a. above and provide calculations. e. In no case can the VCA be less than 10' in depth, with the exception of a pedestrian public pathway to the shoreline. Please remove all other intrusions from plans. f. Show the VCA tract on plans. VCA is required to be set aside in separate tract of land, easement, or trust. This will be important to consider related to the Trail Dedication, and ROW adjustments anticipated. 5. Clarify how the planting and soil memo and Esplanade and Shoreline Planting plan are intended to be used together to address the criteria of approval for the VCA. Consider combining the relevant element of these documents into a VCA Plan. A recordable document will be required with the construction plans for this area. Add elements from 18.20.496 as applicable, such addressing 10 year maintenance and mitigation sequencing for the VCA specifically. Use (and identify) Best Available Science to support conclusions. Address soil volume, existing rip-rap and how plans chosen will function at the depths anticipated. The roots of trees must be designed to be above the sea level, or scientific evidence is needed to show how the specific species will survive. OMC 18.20.496, and OMC 18.20.410.f. 6. The VCA is to be measured from the existing OHWM, please revise accordingly.	1. See Attachment Q: West Bay Restoration Mitigation Plan, March 2022, Grette and Associates,Tacoma, Washington 2. See Attachment P: West Bay No Net Loss and Mitigation Sequencing, March 2022, Grette and Associates,Tacoma, Washington 3. See Attachment P: West Bay No Net Loss and Mitigation Sequencing, March 2022, Grette and Associates,Tacoma, Washington 4. See revised Landscape plans a. No reduction in width along VCA needed b. Impervious surfaces = .2% c. Pathways and non-vegetative = 1.96% d. No reduction in width along VCA needed. e. No reduction with only minimal intrusions for pedestrian pathways f. See revised. 5. The information in the Planting and Soil Memo will be consolidated into notes and drawings in the Shoreline Landscape Plans and Sections and future Specifications as the design progresses beyond 30% into Construction Documents. At this stage though, the information in the Memo allows for succinct info in written form into our design ideas and best available practices that we have used on other projects. 6. See included Applicant's Response to Legal Issues in 1st Substantive Review. Section C
14) Shoreline – Accessory Structures OMC 18.20.620.c	Revision / Additional info	Accessory structures must meet the building setback, however up to 800sf of accessory structures may be constructed within the building setback area. Justification of No Net Loss for said structures is required. As the building setback and VCA are both 30', the total area allowed in the VCA is 800sf. It appears the number of structures exceeds a total of 800sf and the analysis for No Net Loss does not address these structures. If setback reductions are being used, identify such reductions and how those reductions are being applied to the various features.	The design provides 85.6 S.F. of accessory structures in the VCA. Again, the VCA is located adjacent to the proposed OHWL to maximize habitat and to be consistent with the 2016 West Bay Environmental Restoration Assessment Report developed for the City.
15) Critical Area Review – Important Habitats OMC 18.32.300	Revision / Additional info	An Important Habitat and Species Report was not submitted, however information about habitats was included in the Critical Area Report, section 4. The information provided needs to be updated as follows: 1. Identify the boundaries of the study area. According to OMC 18.32.300 the report must address habitats and species on the properties to be developed and must extend beyond the outermost property line by 1,000' in all directions. The report does not appear to address aquatic habitats nor does it extending from the outermost boundary of the consolidated property ownership. 2. The report must address all habitats and species known to occur within Thurston County, all endangered or threatened species, all state priority species, and priority habitats. If any such species are within 1,000' of the site boundaries, the report must address potential impacts from the project. the Habitat assessment did address some species, but seemed to focus on upland habitats and nearby streams. The report must address aquatic habitats, endangered species, etc. The JARPA and SEPA checklist identify several species not addressed in this report such as the fisher, marbled murrelet, streaked horned lark, yellow billed cuckoo, bull trout, and chinook salmon. 3. Management practices proposed within the VCA should be addressed if intended for use by specific species. For example, the Mitigation Sequencing Narrative indicates snags are proposed to be used by raptors, but the habitat assessment does not list raptors as being present near the site. Clarification is needed. 4. If important habitats are found, further analysis as outlined in OMC 18.32.330 will be required. If applicable, consider breaking the Important Habitats and Species Management Plan into an individual document rather than combining with the Critical Area Report to improve readability.	1. SeeAttachment O: West Bay Important Habitat and Species Report, March 2022, Grette and Associates,Tacoma, Washington 2. See Attachment O: West Bay Important Habitat and Species Report, March 2022, Grette and Associates,Tacoma, Washington 3. See Attachment O: West Bay Important Habitat and Species Report, March 2022, Grette and Associates,Tacoma, Washington 4. See Attachment O: West Bay Important Habitat and Species Report, March 2022, Grette and Associates,Tacoma, Washington 5. Results of low-tide walks for SAV are presented in Attachment O: West Bay

		5. Provide a submerged aquatic vegetation diving survey and an intertidal subtidal shellfish survey to characterize the area of impact waterward of the OHWM as requested by the Department of Fish and Wildlife.	Important Habitat and Species Report, March 2022, Grette and Associates,Tacoma, Washington section 4.2.2. WDFW was consulted regarding surveys for shellfish on the site. Specific methods for conducting the survey were discussed, and an intertidal shellfish survey on the site will be conducted in the spring when daytime low tides return. The results of this survey will be appended to the Important Habitats and Species Report
16) Critical Area Review – Streams OMC 18.32.400	Revision / Additional info	Please address the small un-named tributary / stream that appears to extend from the hillside to the west of the site. The creek appears to go under West Bay Drive in a culvert before entering Puget Sound along the northern property line of the project site. It is unclear if this is a regulated stream, nor the habitat function being provided. Please provide analysis of how it does/does not meet the water typing criteria of OMC 18.32.410 and WAC 222-16-031.	See Attachment D: Critical Areas Report, West Bay Yards, February 2022, Grette and Associates,Tacoma, Washington section 7.2.2
17) Critical Areas-Slopes OMC 18.32.600	Revision / Additional info	1. A revised geotechnical report needs to be submitted to address both the requirements of OMC 18.32.600 and 18.20.420. The report needs to address all slopes within 300' of the site, which includes the hillside to the west, and the shoreline environment to the north /east as both appear to qualify as either geologically hazard areas or landslide hazard areas or both. 2. OMC 18.32.605 Geological Hazard Areas. If the site is determined to be a geologically hazardous area, the geotechnical report must address each of the criteria within this section and must include information regarding the existing and proposed site conditions. This evaluation must include all parts of the site and all land within 300' of the site. 3. OMC 18.32.610 Landslide Hazard Areas. Slopes exceeding 40%, slopes of 15% with seeps and other areas identified as showing movement in the past 10,000 years are landslide hazard areas. Identify any and all landslide hazard areas within 300' of the site and address the criteria within the code related to them. In particular, the slope to the west of the property across West Bay Drive appears to be a landslide hazard area and will need to be addressed. Similarly, the slope to the north / south along the shoreline edge also appears to meet the criteria. See OMC 18.32.640 for criteria related to the contents of the geotechnical report. 4. Specific landslide hazard area buffers will need to be recommended (if applicable) by the geotechnical report. Structures and works proposed in these areas will need to be carefully evaluated, including earthwork, stormwater piping, utilities etc. 5. OMC 18.32.650 Erosion Hazard Areas: Identify if the site or any area within 300' of the site is an erosion hazard area. If it is, additional information within the geotechnical report will be required as outlined in OMC 18.32.655.A 6. Note: The geotechnical report must make specific findings as required by the Shoreline Master Plan related to the retention of the existing rip-rap armoring. Is it necessary for long term site stability? If removed what impacts would that have to the site stability? This information must be referenced as appropriate in the analysis for no net loss and mitigation plan. 7. The site modifications such as fill, groin, and other shoreline modifications must be addressed by the geotechnical report.	See Addendum to Attachment A – Development Geologic Hazards Assessment, West Bay Yards, October 29, 2021
18) Critical Areas – Floodplain Management	Additional Information	The project is located within a 100 year flood zone and requires a FloodPlain Habitat Assessment (MMFS BiOp) to address potential impacts to endangered species. Please provide the report.	See Attachment D: Critical Areas Report, West Bay Yards, February 2022, Grette and Associates, Tacoma, Washington
19) Landscaping Plan	Revision / Additional info	Detailed review of the landscaping plan will occur at the engineering construction permit phase. Conceptual review will address any site design changes - please revise the landscaping plan as follows: 1. Show utility lines and stormwater vaults etc. to ensure no conflicts. 2. Show soil volumes for all planting beds located where native soil will not be available. Several planting beds appear to be placed on the parking structure, plans must demonstrate adequate soil volume for species proposed. Tree spacing within planting areas appears deficient. 3. Islands are required to be 12' in width (6' distance to hard surface from a tree), all islands must meet a minimum of 144sf. Revise surface parking islands at north end of project. 4. Perimeter landscaping is required between West Bay Drive and the parking lot, minimum width 10' for surface parking. 5. Revise plans to more clearly identify which of the parking spaces are surface or Plans must clearly identify which of the parking stalls are surface parking and which are in-building parking. Calculations showing compliance with the required minimum interior landscaping areas per parking stall must be provided on the landscaping plan. Perimeter landscaping areas do not count towards this requirement.	1. Utilities Shown on updated landscape plans 2. Almost all plantings are located on structure, planters will be a combination of intensive and extensive green roof plantings and raised beds or planters. Most planters with groundcovers will have a minimum depth of 4" to a maximum of 24" or greater. Additional information will be added to the details. 3. Center Island needs will not allow for a 12' island, islands are greater than 144 sq. ft. 4. Existing buffer needs to be increased and parking island will be enlarged. Landscape

		6. Use existing OHWM to calculate the 30' Vegetation Conservation Area. Revise planting plan accordingly. 7. Show soil volumes for planting plan associated with VCA. Trees will not survive if the roots are below the OHWM and therefore inundated with saltwater regularly.	area needs to be enlarged along West Bay by 1.5' ft 5. All parking within the site is over structure and covered. Landscaping is being provided along the perimeter of the building to screen 30' VCA calculated from proposed OHWM to be confirmed at time of shoreline improvements. 6. See included Applicant's Response to Legal Issues in 1st Substantive Review. Section C 7. We are providing a refined section to show soil preparation for the VCA in the context of the VCA which is situated landward of the proposed OHWL. We are providing a planting selection that will be tolerant of occasional tidal inundation and the associated saline conditions. Planting used adjacent to the OHWL will only occasionally be inundated with tidal waters. The planting substate will be created by the placement of sand, and gravel mixed with topsoil to create a substrate on top of the existing rip rap or the proposed gravel berm. In some cases, topsoil will be tilled or mixed into the gravel berm material. The depth of the soil media will be adequate for planting growth with 24"-30" in the riparian and transitional zones, and 8"-12" in the salt marsh above elevation 8 NAVD88 (12 MLLW).
20) Vehicular Parking	Revision / Additional info	1. Timing of the plaza level parking will need to be addressed or parking analysis will need to be further refined. Adequate parking for building 1 will need to be identified as the plaza level parking associated with building 5 may not be built for 15 years. 2. Parking for a restaurant at 11,225sf has been addressed, but other onsite commercial uses do not appear to have been calculated such as: pet grooming, café, fedex/kinkos, coffee house etc. SEPA checklist indicates 9,200sf of restaurant and 11,200 of other commercial. Please clarify commercial parking calculations. 3. Please identify the loading area OMC 18.38.140 4. Provide a pedestrian route analysis as outlined in OMC 18.38.220.d. It should address pedestrian circulation through the site addressing any areas a pedestrian is likely to go. This includes the various levels of the parking garage, around the entries/exits of the garage, and any adjacent amenities such as the trial.	1. See A100.1 and A100.2 parking calculations for each phase. 2. See sheets A100-A100.2 for updated parking calculations 3. Loading per OMC18.38 located at main round about. One loading Berth provided for all commercial uses as the total sf is below 20,000 sf 4. See A100.3 Pedestrian Route Plan
Bicycle Parking	Revision / Additional info	1. Short term –This parking is intended to be as conveniently placed as possible for the patrons of the various tenant spaces. Of the 96 identified on plans to be provided, only about half are shown on plans. All bicycle parking spaces must be covered, the cover should match the architecture of the building. Locating these covered structures within the view corridor will need to be carefully reviewed. Please provide additional detail on the number, spacing, location, and design of the cover. Additional spaces are likely required for commercial uses as that does not appear to have been addressed. 2. Long Term – interior spaces. Interior bike parking space for each tenant space is required and must be identified on plans, with dimensions. Please identify the location of these spaces. If exterior lockers are preferred, the type/model needs to be provided. According to OMC 18.38.220.c lockable clothing/gear storage must be provided.	1. See Sheet A100.1 and A100.2 for Bike parking calculations and locations. 2. See Sheet A100.1 and A100.2 for Bike parking calculations and locations.
Design Review	Revision / Additional info	Provide response to all design criteria in OMC 18.110 (Basic Commercial), and OMC 18.155 (West Bay Drive). The checklist for basic commercial is available upon request. 1. Basic Commercial design criteria includes requirements to address views and to provide amenities where public views are intended to be provided. Such analysis is necessary and can be submitted as an element of the view analysis or design review narrative.	1. See revised View Analysis Narrative 2. See Sheets 302, 304, 306, 308, 310 for glazing calculations.

		2. Calculations showing 60% of glass at ground floor along West Bay for each building need to be submitted, or analysis of equal or better must be provided. 3. West Bay Drive District asks that projects maintain dark skies to the extent possible and avoid glare over the water. This will be an important element to address with the revised submittal related to design and habitat impacts.	3. See sheet A900. All lighting will be dark sky compliant and provide required illumination as required along accessible routes and for the safety of the community. Lighting immediately adjacent to the VCA will be low bollard fixture to illuminate walk way and minimize lighting along shoreline.
Land Division	Information only for future submittal.	Further discussion regarding the type of land division appropriate for this site is needed. Given the amount of change proposed and the various dedications and other modifications necessary a short subdivision, or binding site plan is more appropriate. The first step towards determining if a Boundary Line Adjustment would include a Legal Lot Determination. Based on the documents provided, the City has identified five existing legal lots. Minor relocation of these five parcel lines is possible as a BLA, provided plans can clearly identify the original location and proposed location of lines.	
21) SEPA – General Review	Revision	General revisions needed: 1) Review the SEPA checklist guidance on the Department of Ecology's website to assist with the required depth and bredth of answers required: https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance Please revise the SEPA Checklist as follows: A.10: Governmental approvals, add design review and Ecology VCP. A.10: Check numbers against other documents for accuracy. B.1 - Earth: g: Revise -building coverage is limited to 60%, there is no impervious surface limit. B.3 - Water: c.2 – Response implies the City has previously approved restoration plans – which is not quite accurate. City approve assessments evaluating areas to be restored. Once a restoration plan is created, response should be updated to reflect its conclusions. B.4 - Plants c Endangered species – List all threatened or endangered species identified in reports and identify source. B.10 Aesthetics b. views – from what viewpoints B.11 Light and Glare a. glare – Add language about light and glare towards the shoreline environment. What type of fixtures are proposed and why? B.13 Historic Preservation: The Responses to Questions 13 a. and 13 b. are not consistent with the Cultural Resources Survey completed by the applicant. There are historic sites 45+ old nearby. The survey indicates there are 13 registered historic structures within one mile. And 13b. indicates no evidence on site of past historic use, but there is ample evidence of historic (post-contact) use. Strong likelihood of evidence of Native American habitation is reduced due to prior site disturbance but should not be dismissed, and SEPA response could include note regarding high number of known archeological sites in close proximity.	The SEPA checklist has been revised as requested.
ENGINEERING			
Engineering – Frontage Improvements	Revision	1. Request for Deviation to the Standards – The request for a Deviation to the standards will require revision before and approval could be made. Comments/revisions include: a. The Deviation request is required to be more specific. Assume the reader has no knowledge of other documents, previous discussions or the project in general. For instance – the request refers to low traffic volumes. In what sense are the volumes low – is it that is project does not create much traffic or is it the south bound traffic on West Bay drive will have a low volume of left hand turns into the site, or some other scenario? Describe the movements and the details of these types of statements. Where can the information be found? Is the information included in the TIA for instance? b. Be specific as to the determination of why and how left turn lanes are not warranted and how the proposed raised intersections play a role. c. Be specific as to location of the pedestrian crossing that the deviation mentions. Assumption is that is located at the Woodard Street intersection, but deviation does not specifically say that. d. Include language in the deviation for the use of the raised intersections and that is not a current City of Olympia standard. Be specific on the purpose, function, benefits, and how they fit into the project scope.	1. The deviation request has been updated to include the requested revisions. 2. The pedestrian crossing has been relocated to the south of the 1441 West Bay driveway. The pedestrian crossing also allows for a northbound left turn pocket in this location. 3. See responses below for response to Dave Smith comments.

		e. At the neighborhood meeting, safety of using west bay drive was a huge concern (by all modes of transportation). How this project is addressing and improving these concerns will be highly evaluated? 2. Shift the pedestrian crossing to the southern edge of the driveway serving 1441 West Bay. This will allow continuity and connection with the existing sidewalk on Woodard Avenue. 3. See attached document with Dave Smith's complete comments on design and TIA	
22) Engineering – Storm Drainage	Revision / Additional info	1. MINIMUM REQUIREMENT 4 PRESERVATION OF NATURAL DRAINAGE SYSTEMS AND OUTFALLS: The project is not clear about how it will handle the multiple sources of off-site run-on flow from the hill, although it is discussed somewhat in Section 6.1 Qualitative Upstream Section of the report. The proposed project appears to collect this water from the West Bay Drive drainage system, mix it with more polluted runoff, and then treat it in the proposed Modular Wetland systems. Revise plans to clarify and consider a dedicated storm system to convey this clean water through to Puget Sound while it is still clean. 2. MINIMUM REQUIREMENT 6 RUNOFF TREATMENT: The report says the runoff from West Bay Drive will not be treated because the frontage improvements are less than 2,000 s.f. If this water is to be routed through the proposed Modular Wetland treatment systems, then they must be sized to accommodate all of the volume of water that is routed to them. 3. OUTFALLS: Revise plans to clarify proposal. The City expects all existing outfalls to be used, new outfalls, or future outfalls associated with this project will be reconstructed and meet code, and all existing outfalls not used will be decommissioned, in accordance with the requirements of Washington Administrative Code (WAC) Hydraulic Code Rules Chapter 220-660. Plans need to more clearly specify intent. 4. WATER QUALITY SYSTEM: a. It is difficult to tell what surface areas are being treated in the 3 water quality treatment basins, revise accordingly. b. Covered parking areas should drain to an oil water separator and discharge to the sanitary sewer. c. How will runoff from the pavement areas that connect between building be collected and treated? d. Same question for the entrance and roundabout? e. It appears that runoff from West Bay Drive is collected and routed to the treatment systems. If this is accurate, then the water quality treatment system must be sized to accommodate these flows, including the flows from off the hill. f. If a dedicated storm system is proposed to separate West Bay Drive flows, then provide more detail on this proposed system. 5. CATCH BASIN #12: This is the catch basin located immediately upstream of the outfall for all roof drains and the pedestrian walkway along the shoreline. The City requests a Pre-Treatment hydrodynamic separator at this location, to remove sediment, litter, cigarette butts, masks, etc., in order to address the Lower the Budd Inlet TMDL for Total Suspended Solids. 6. TESC PLAN (sheet EC-01): In the legend, the notes Existing water line to be removed and Existing storm line to be removed are swapped.	1. The plans have been revised to keep off-site stormwater separate from on-site stormwater. Water quality is provided for pollution generating impervious surfacing for on-site stormwater. 2. Existing water quality systems provide water quality for the west side of West Bay Drive and upstream off-site developments. Water quality will be provided for runoff from the east side of West Bay Drive and on-site PGIS. Off-site stormwater will remain separated from on-site stormwater until the on-site stormwater has been treated. 3. The plans have been revised to clearly delineate which outfalls are to be re-used or decommissioned. 4. a. A water quality basin map has been provided in the drainage report to clearly delineate the three water quality treatment basins. b. Agreed. The oil/water separator and connection to sanitary sewer will be provided by the plumbing plans. c. Due to shallow finish grade to top of garage slab depths, a series of catch basins and storm drains will not work. A series of trench drains are proposed to collect surface runoff and route PGIS to the water quality systems. d. See response to item c above. e. It is intended to keep off-site stormwater separate. Water quality will be provided for on-site stormwater and the eastern half of the frontage improvements. 5. A pre-treatment hydrodynamic separator has been provided as requested. 6. The legend has been revised as requested.
23) Engineering – Solid Waste	Revision	1. Applicant has not shown adequate details for solid waste. storage and collection. It is not clear where the solid waste truck will enter and exit the site from/to West Bay Drive. SHOW ACCESS ON SITE PLAN 2. Solid waste trucks require minimum 14' of clearance for passage and 25' overhead clearance for loading and unloading compactors and drop boxes. 3. If any recycle carts or corrugated cardboard dumpsters are anticipated, these shall be noted on the site plan. Collection locations shall demonstrate the ability with turning movements to access and collect. 4. Any front load service requires 25' clearance. Solid waste and recycling storage capacity may not be adequate with a single compactor for garbage and one for recycle. 5. Applicant will need to calculate waste generation at 1.1 cubic yards of waste per household per month and 1 cubic yard per 500 square feet of commercial space. Use 4.33 weeks to calculate weekly volume. 6. Applicant will also need to plan for organics collection due to anticipation of restaurants. 7. Applicant will also need to show how solid waste will be managed during the phased construction approach. 8. Applicant shall include all solid waste information in the civil set of plans. 1 sheet in the architectural set is not sufficient and does not address Chapter 8 of the EDDS. 9. Applicant is encouraged to engage in another solid waste scoping meeting.	1. See updated civil turn radius 2. All tuck access doe not have overhead structures. Compactors are located outside any buildings footprints. 3. Waste to be delivered to solid waste facility and deposited in compactors. Recycle to be comingled in compactor for pick up. Additional Solid waste collection to be handled by onsite staffing and coordination with collection. 4. See comment #2 5. See updated solid waste calculations on revised site plans 6. To be determined at later phase. 7. Compactors to be installed at phase one with internal collection by site management. 8. Final solid waste plan will be provided at time of civil engineering permit submittal. Solid waste will

			be designed for both buildings with solid waste design consultant throughout the remaining design phases. 9. Acknowledged.
24) Engineering – Traffic	Revision	With a full 3 Phase build out, this development will generate 239 (148 inbound, 91 outbound) new p.m. peak hour trips and is not expected to have a significant impact on the City of Olympia Street system. All study intersections and driveway access points will operate at an acceptable level of service and no off-site mitigation is required except for the several improvements that will be needed to provide safe and accessible access to the development and are outlined below. • **Engineering Design and Development Standards (EDDS), Chapter 4, Table 1: Street Classifications and Number of Lanes,** indicates that the required frontage improvements to West Bay Drive are classified as a 2/3 lane major collector with bike lanes (EDDS Std Dwg 4-2G5). Due to higher speeds greater than the current 30 mph speed limit (operating speeds are greater than 35 mph) and increased safety risks of "rear-end" type of collisions to vehicles waiting to turn left into any of the three West Bay Yard's driveway access intersections, it is required to mitigate conditions with either a continuous two-way left-turn lane or traffic safety management system that will slow traffic to speed less than 25 mph ("Traffic Calming"). The project proposes an acceptable mitigation strategy to provide: Raised asphalt intersections are proposed at the northern and southern project limits. These locations were chosen to slow down traffic speeds through the entire project frontage. A raised stamped concrete intersection is proposed near the middle of the site which is also the main entrance to the site. These traffic calming devices will be designed to lower operating speeds along to the project frontage to less than 25 mph. A deviation request is needed to advance this proposed roadway design. Identified in the 2005 West Bay Drive Corridor Study and required with the EDDS Std. Dwg. 4- 2G5. A raised pedestrian crossing island per Std. Dwg. 4-48A is needed at Woodard Street for the Woodard Trail crossing to access amenities along West Bay Drive. This crossing needs to be located south of the intersection with a minimum 8-foot width. This raised feature will not only will provide refuge for people walking and biking but contribute to the overall safety and traffic calming along the project frontage. As identified in the TIA, the peak hour traffic volume with the West Bay Yard project on West Bay Drive is projected to be 855 vehicle per hour north of the roundabout at Harrison Avenue to 705 vehicles per hour at the project location north of Brawne Avenue. This approximate 65 to 75 percent of the corridor's total capacity or will operate at an acceptable level or service "B." • There are several issues that the public has made comment on. The TIA needs to be supplemented with an addendum to formally address their issues. 1. Analyze project impact to the intersection of Division Street and Harrison Avenue. From Figure 5, Site-Generated PM Peak Hour Traffic Volumes, it is apparent that more than 20 trips in the peak hour will impact this intersection and by the TIA Guidelines need to be considered as a study intersection. 2. The model and traffic assignment (Figure 5) does not show any trips though the Northwest Neighborhood via Brawne Avenue or any other street. Re-run the travel demand model with TAZ 454 and centroid connection to West Bay Drive in the location of the project site. Regardless of the model and through engineering judgment there will be some traffic that will impact the neighborhood with destinations to businesses such as the Olympia Food Coop, other commercial businesses on Division Street and schools to the west. In Section 6 of the TIA, describe the expected level of project impacts to the recognized Northwest Neighborhood and any mitigation strategies needed. Also describe any anticipated traffic impact during any expected project construction street closures or weather events (ice) that temporarily close Brawne Avenue and Schneider Hill Road. 3. Verify stopping sight distance at the intersection of Brawne Avenue and West Bay Drive to determine the available Clear Sight Triangle (EDDS 4B.150,B and Std. Dwg 4-1C) and potential mitigation for the 85th percentile operating speed (approximately 35 mph) on West Bay Drive. Indicate that the City of Olympia will be improving sight distance at this intersection by relocating streetlight pole, mailbox cluster and vegetation north of Brawne Avenue on the west side of West Bay Drive. This will provide drivers on Brawne Avenue a clear sight-line at 15-feet from the edge of the travel lane on West Bay Drive. 4. In addition to intersection delays for without and with project conditions, provide travel times on West Bay Drive from Brawne Avenue though the Harrison Avenue and the West Bay Drive roundabout. 5. Lastly in section 3.3 of the TIA, daily traffic count data is missing from all traffic volume figures. This needs to be updated. Also, provide the dates	1. Added this intersection 2. The select zone analysis was refined and the assignment of traffic was adjusted to account for traffic using Brawne Avenue 3. Description of impact has been added 4. Per City guidance, language has been added 5. This has been added 6. Daily volumes and date of counts has been added

		of the traffic counts and explicitly state that the counts represent "Pre-Covid19" conditions.	
Addressing			
25) Address	Note	Each of the five proposed buildings will receive a separate address. All suites and units will be assigned numbers as well. This will be done at the time the building permit is submitted.	**NOTHING AT THIS TIME**
Building			
26) Building Code	Information Only – No Revision for Land Use	1. The Building Department has the following comments: When the building permit is applied for: 2. Project will be developed in a Special Flood Hazard Area, AE15. Submittal documents will need to comply with requirements for developing in a SFHA. An elevation certificate from a recognized Wa State licensed surveyor will need to be submitted at the time of application. Only storage, parking and access to residential units will be allowed below BFE. Construction documents must show the method of controlling the impacts of damage associated to sea level rise. Prior to Building Permit Approval, applicant must secure applicable permits and approvals from US Army Corp of Engineers, Washington Department of Fish and Wildlife, US Fish and Wildlife Service and State of Washington Department of Ecology. 3. When the Building permit is applied for the project will be reviewed under the currently adopted version of the International Building Code (IBC) International Mechanical Code (IMC) International Fuel Gas Code (IFGC) Uniform Plumbing Code (UPC) ICC A117.1, and Washington State Energy Code (WSEC) as amended by Washington State. 4. All structural plans and calculations must be designed, stamped, and signed by a Washington State licensed Structural Engineer. Application for all sub permits should be submitted immediately following the commercial building permit submittal. 5. A geotechnical report must be submitted addressing building on unstable soils. The Geotechnical Engineer of record must approve the footing design done by the Structural Engineer. 6. Project will be required to provide type A units and B units complying with the currently adopted version of ICC A117.1 chapter 10. Please indicate on the plans clearly which units are type A. Please provide on the submitted plans ICC A117.1 chapter 4 provisions for accessible routes	Acknowledged requirements at time of building permit submittal.
27) Fire	Revision	Design shall adhere to OMC 16.05.060 Fire fighting access. Current Plans do not meet access requirements between buildings 1&2, 3&4, 4&5 with the proposed pedestrian pathways that stretch East to West. Vertical clearance on all access roads shall be 13' 6" in height. Each accessible building facade shall be within 21 feet of the closest edge or curb of the promenade which will be utilized as an access road on the waterfront.	Fire protection plan will be submitted at time of engineering permit documents.
28) Historic Preservation	Additional Information	Per OMC 18.12.130(b) recommendations and/or requests by Consulting Tribes on cultural resource protection will be given substantial weight in City decisions on land use approval and subsequent permit issuance. In response to comments received from the Squaxin Island Tribe, the City requests revisions/ additional information by providing deep testing using controlled excavation with a flat bucket backhoe, or a vibricore testing strategy, to identify cultural resources or cultural resource-bearing deposits. It is recommended that a testing strategy take into consideration the variable water table throughout the project area, and that it be described in a research design document that can be shared with the Tribe for further consultation before it is implemented. Pending results of the recommended testing and documentation, an improved understanding of site conditions relative to cultural resources will inform the project design.	AQUA TERRA
URBAN FORESTRY			
29) Tree Protection and Replacement OMC 16.60	Revision	1. HOWL – Highest Observed Water Line. Describe why this information is relevant. 2. What is the projected Sea Level Rise for the developments projected life span? Trees appear to be planted within the HOWL. Provide elevational data for tree planting location. 3. Provide confirmation from the Department of Ecology the OHWM translates to 14.56, which is what the OHWM was under the prior datum. 4. Provide Parks technical workup on the parcel to the south which identifies datums for comparison purposes. 5. How will the fill added to the VCA be retained due to tidal actions? 6. How will 'salt marsh and riparian' area plantings be protected during establishment. 7. How will the proposed trees, within the Shoreline VCA, be protected from saltwater spray and saltwater inundation in perpetuity. Provide soil volume data and construction methods if trees are located within a protected vault. 8. Provide tree species options which can grow and thrive and reach their natural mature size along the shoreline (in saltwater) and within planting containers above the parking garages. 9. Provide planting container detail s for trees planted above parking garage. 10. Provide credentials of persons with expertise in shoreline vegetation and restoration.	1) Not Applicable to Urban Forestry. Drawings are for multiple reviewers. 2) Projected Sea level rise per City of Olympia = 16'0" NAVD88. See JARPA for planting elevations. 3) See included Applicant's Response to Legal Issues in 1st Substantive Review. Section C 4) Not Applicable 5) Attachment M: Preliminary Engineering Design Report, West Bay Yards, March 2022, Moffatt & Nichol, Seattle, WA 6) Planting used adjacent to the OHWL will only occasionally be inundated with tidal waters. The

		11. Confirm buildable area of the parcel is 5.05 acres (parcel area – ROW – critical area= Buildable area) with project Forester. 12. Tree Unit Calculations and Tree Protection measures and tree species to be determined at time of Engineering permit review. Tree planting details will be reviewed during Engineering permit review. 13. Replace reference to 'Tree Tract #1 and #2' with Vegetation Conservation Area.	planting substate will be created by the placement of sand, and gravel mixed with topsoil to create a substrate on top of the existing rip rap or the proposed gravel berm. In some cases, topsoil will be tilled or mixed into the gravel berm material. The depth of the soil media will be adequate for planting growth with 24"-30" in the riparian and transitional zones, and 8"-12" in the salt marsh above elevation 8 NAVD88 (12 MLLW). 7) Will be provided at time of Engineering submittals 8) Will be provided at time of Engineering submittals 9) Almost all trees within the project site are located over structure, raised planters are going to be used to maximize the amount of soil the trees are planted in (min. 24"). Details for plantings to be found on Landscape sheet LS-06 and will include additional information on depth. 10) Landscape plans will be stamped by licensed Landscape Architect. 11) See update site plans 12) Acknowledged 13) See updated Landscape plans