



December 6, 2021

SSHI, LLC dba DR Horton  
Kevin Capuzzi  
11241 Slater Avenue NE  
Suite 200  
Kirkland, WA 98033

Re: Tickner Farms Preliminary Plat (TUM-21-1683) and Planned Unit Development (TUM-21-1695) Applications; Request for Additional Information and Notice that Project Review Clock Has Stopped

Mr. Capuzzi:

The City of Tumwater deemed your applications complete on November 23, 2021. After further review of the Preliminary Planned Unit Development and Preliminary Plat application materials, and pursuant to RCW 36.70B.070(2), the City requests further information in order to continue its review of the applications. At this time, the 120 days review time has stopped pursuant to TMC 14.04.040.

The following is a list of items that require further information, based on the application materials submitted:

1. As proposed, the Preliminary Planned Unit Development and Preliminary Plat applications do not meet the requirements of the State Environmental Policy Act (SEPA). The applications' expanded SEPA environmental checklist does not adequately define the scope of the project proposal and fails to address cumulative impacts of related and interrelated development.

The SEPA Environmental review and supporting documents must include the proposed and conceptual build-out of the approximately 296.86-acre project site.

2. The two applications as proposed must meet the first criterion required by TMC 18.36.050(A) that:

*"The hearing examiners decision to approve or deny the development shall be based on at least, but not limited to, the following criteria:*

A. *Substantial conformance to the Tumwater comprehensive plan;*

[...]"

As proposed, the two applications are not in substantial conformance with the City of Tumwater Comprehensive Plan. The applications do not either provide for or address the vision in the Comprehensive Plan Land Use Element for the project being a mixed-use urban village containing development of a wide range of densities and uses as contained in the Comprehensive Plan and its elements, subarea plans, and maps for the approximately 296.86-acre project site.

3. As proposed, the two applications are not in substantial conformance with the City-Wide Land Use Map and Zoning Map. The size of the areas for each land use designation and zone district on the site plan must match the size of the area for each as shown on the City-Wide Land Use Map and Zoning Map for the approximately 296.86-acre project site. Such areas must be shown graphically on the site plan, in a table on the site plan, and follow TMC 18.36.010(B)(4) to:

*“Produce an integrated or balanced development of mutually supportive uses that might otherwise be inharmonious or incongruous.”*

The Comprehensive Plan land use designations as shown on the City-Wide Land Use Map and described in the Comprehensive Plan Land Use Element are the basis for the designated sizes of the zone districts on the approximately 296.86-acre project site shown on the Zoning Map and described TMC Title 18 *Zoning*.

The planned unit development overlay zone process in TMC 18.36 *PUD Planned Unit Development Overlay* allows for some modifications to the individual zone district requirements through TMC 18.36.080 *Exemption from Zoning Requirements*. However, the planned unit development overlay zone process does not change the designated sizes of the areas on the 296.86-acre project site established for each of the land use designations in the City-Wide Land Use Map City-Wide Land Use Map and the zone districts in the Zoning Map.

The borders and areas of the land use designations and zone districts proposed shall be shown graphically on the site plan and they shall follow tract or lot lines and the centerlines of streets and alleys were applicable in a balanced, cohesive, and interrelated manner, so that there is no gerrymandering of zone districts.

To demonstrate substantial conformance to the Comprehensive Plan as required by TMC 18.36.050(A), the site plan for the applications must show the boundaries of the land use designations and zone districts that make up the approximately 296.86-acre project site and the site plan shall reflect the following:

- The areas on the site plan allocated to same land use designations and zone districts shall have the same name and size, except where the Utilities land use designation is assigned one of the other zone districts on the project site.
  - Any half streets in the site plan shall be adjacent to lots or tracts of the same land use designation and zone district on one side.
  - Any full streets on the site plan shall be adjacent to lots or tracts of the same land use designation and zone district on both sides.
  - Tracts for stormwater, parks and open space, and other uses on the site plan shall be distributed proportionately in area over the areas of all the land use designations and zone districts on the site plan.
  - None of the areas assigned to zone districts on the site plan shall be primarily streets or tracts. The majority of each of the areas of all the land use designation and zone should be developable building lots.
4. As proposed, the two applications do not meet the density requirements of the underlying zone districts on the site as established by the Comprehensive Plan Land Use Element and the individual zone district chapters in TMC Title 18 *Zoning*. A plat cannot “blend all zones together, and provide an average.”

The Comprehensive Plan, TMC Title 18 *Zoning*, and TMC 18.36 *PUD Planned Unit Development Overlay* do not allow for the blending of densities across land use designations and zone districts. The land use designations and zone districts on the approximately 296.86-acre project site each have their own requirements for minimum and maximum density.

The project shall meet the minimum and maximum densities in the specific, clearly defined areas of each zone district covered by the planned unit development overlay according to TMC 18.36.080(B).

To change the size of the land use designations or zone districts on the project site requires a Comprehensive Plan map amendment application and an associated rezone application to be filed, following the process found in TMC

Chapter 18.60 *Text Amendments and Rezones*. Such amendments would need to be approved by the City Council as part of their annual Comprehensive Plan amendment cycle.

5. As proposed, the two applications do not provide the necessary information to demonstrate how they meet the allowed use requirements of the underlying zone districts.

Each of the zone districts on the approximately 296.86-acre project site have their own requirements for allowed uses. The application must show how this is being done.

6. As proposed, the two applications do not provide the necessary information to demonstrate how they meet the lot coverage requirements of the underlying zone districts or modify those requirements through TMC 18.36.080(D).

Each of the zone districts on the approximately 296.86-acre project site has their own requirements for lot coverage. The applications shall show how this is being done.

7. As proposed, the two applications do not provide the necessary information to demonstrate how they meet the minimum yard setback requirements from perimeter boundary lines of the underlying zone districts.

Each of the zone districts on the approximately 296.86-acre project site has their own requirements for setbacks from perimeter boundary lines. The applications shall show how this is being done.

8. As proposed, the two applications do not provide the necessary information to demonstrate how they meet the open space requirements of the underlying zone districts.

Each of the zone districts on the approximately 296.86-acre project site has their own requirements for open space. The applications shall show how this is being done.

9. As proposed, the two applications do not provide the necessary information to demonstrate how they meet the Citywide Design Guidelines for the uses proposed. The applications shall show how this is being done.

10. As proposed, the two applications do not provide the necessary information to determine the structural heights proposed by the project. The applications shall show how this is being done.

11. As proposed, the two applications do not meet the City of Tumwater Drainage Design and Erosion Control Manual and Development Guide. The modified street standards with private stormwater within all public right-of-way does not reflect previous discussions with City staff.
12. As proposed, the Transportation Impact Analysis does not adequately address cumulative impacts from future development and growth caused by the approximately 296.86-acre project site. The Transportation Impact Analysis shall be revised to address cumulative impacts from future development and growth caused by the approximately 296.86-acre project site.
13. As proposed, the two applications do not provide the necessary information to demonstrate how the project will mitigate its SEPA environmental impacts to the City's transportation multimodal system because of the development of the approximately 296.86-acre project site.

The Transportation Plan and Appendices, including the Black Hills Subarea Transportation Plan, provides specific direction and support for the mitigation of SEPA environmental impacts to the City's transportation multimodal system facilities by the proposed project. The applications shall show how this is being done.

14. As proposed, the two applications do not provide the necessary information to demonstrate how the project will mitigate its SEPA environmental impacts to the City's parks system because of the development of the approximately 296.86-acre project site, which is in addition to the open space requirements discussed above.

The 2008 Parks, Recreation, and Open Space Plan and the 2016 Parks, Recreation, and Open Space Plan Update provides specific direction and support for the mitigation of SEPA environmental impacts to the City's parks, recreation and open space facilities by the proposed project. The applications shall show how this is being done.

There are two components to the provision of parks, recreation, and open space in the City that must be addressed by the SEPA environmental review process:

- 1) The amount of area provided for individual park, recreation, and open space facilities citywide; and
- 2) The locations of such facilities to serve an underserved local neighborhood such as the Littlerock Neighborhood.

As part of the SEPA environmental review process for the project, the applications need to address the following improvements called for by the 2008 Parks, Recreation, and Open Space Plan and the 2016 Parks, Recreation, and Open Space Plan Update:

- A. Streetscape improvements adjacent to the project site.
- B. Road bicycle touring improvements adjacent to the project site.
- C. The provision of athletic fields and playgrounds, including a neighborhood park of at least five-acres in size, as all as outdoor basketball courts, soccer fields, and baseball/softball fields. Provision of these facilities shall meet the mitigation ratios identified in the Plan for the number of new residents expected by the project to offset the impacts to the City's park, recreation, and open space system caused by the project.
- D. A neighborhood park of at least five-acres in size to serve the needs of the new residents expected by the project.
- E. Interpretive signage describing the natural system of Belmore Marsh on the outer edge of the wetland buffer facing a public street or active recreation area to meet City development standards to offset the impacts to the City's park, recreation, and open space system caused by the project.
- F. Public linear multipurpose trails as called for by the 2008 Parks, Recreation, and Open Space Plan and the Black Hills Subarea Transportation Plan. Provision of these facilities shall meet the mitigation ratios identified in the Plan for the number of new residents expected by the project to offset the impacts to the City's park, recreation, and open space system caused by the project. These public linear multipurpose trails include linear multipurpose trails in the BPA Powerline Easement. In addition, these public linear multipurpose trails shall provide connections to the larger Citywide system, including a linear multipurpose trail connection to the rail line trail west of the project site, as called for by the 2008 Parks, Recreation, and Open Space Plan and the Black Hills Subarea Transportation Plan.

The number of people per household used to calculate the final mitigation ratios would depend on the mixture of dwelling units proposed for the approximately 296.86-acre project site in the applications.

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Please provide the above information by January 3, 2022. If you need additional time prepare the required information, please request so in writing. If, at resubmittal the environmental information is not complete, it is the City's intent to issue a Determination of Significance and request for comment on the Scope of an Environmental Impact Statement.

If you have any questions, please feel free to contact me at [tmerriman@ci.tumwater.wa.us](mailto:tmerriman@ci.tumwater.wa.us) or you may call (360) 754-4180.

Sincerely,

Tami Merriman, Permit Manager  
City of Tumwater

cc: Jeff Pantier, Hatton Godat Pantier  
Tumwater Development Review Committee