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January 4, 2021

City of Bellingham  
Planning & Community Development  
210 Lottie Street  
Bellingham, WA 98225

Attention: Kathy Bell, Senior Planner

Subject: Plat of Barkley Heights  
Response to Request for Improved Information

Dear Ms. Bell:

We have reviewed the requests for improved information dated December 4, 2020 regarding the Plat of Barkley Heights permit submittal. Below is a summary of significant changes.

- One infill toolkit lot has been removed to meet FAR and Open space requirements
- Small house drawings have been updated to reflect grade change between Sussex and Chandler, basement now included
- All site plans have been reconciled and latest plat drawings have consolidated into one PDF file within the "Site Plans" folder
- Housing Code Analysis and Decision criteria documents have additional detail
- Departure and variance requests are now included
- Applications have been updated
- Wetland mitigation report has been updated (see comments below on trail impacts)
- Traffic report memo has been included

Below are the original comments followed by our response to each comment.

1. Application Material Completeness:

- It is the applicant's responsibility to demonstrate the proposal meets code.
- As presented, it is the city's opinion that the responses to the preliminary plat decision criteria is insufficient for the either the hearing examiner or staff to determine the proposal satisfies code.
- As requested in the previous requests, response must state and demonstrate how a criteria is met.

**Response: The decision criteria document now includes specific examples demonstrating how the project meets code. A project narrative has also been added.**

2. Application Material Inconsistencies:

- Application materials need to be reconciled to ensure the information is consistent. This is mostly related to critical areas.

**Response: Site plans have been reconciled. It is expected additional updating will be required after the City and Parks make a decision on the trail connections.**

3. Retaining Wall:

- The proposal did not include any details related to the design of the wall (height, thickness, finish materials, etc.).
- The cross sections suggest the wall is around 30 feet tall;
- The critical area delineation states the wall will be 15 feet tall.

**Response: See revised site sections. The wall proposed will typically be 15' high, but a little higher in some cases depending on final grades. Detention vaults will be cast-in-place as part of the wall. Concrete gravity blocks may be used between some cast-in-place sections where detention vaults are not located.**

4. Critical areas: The application drawings need to be reconciled to consistently show the proposal's impacts and mitigation concerning the wetlands and associated buffers. Revise the "date drawn" on all revised drawings.

**Response: Wetland exhibits have been updated to include impacts from the stairs. Further updates will likely be required after the City and parks make a decision on the trails.**

5. Infrastructure:

- Would a reduced 50-foot right of way dedication reduce critical area impacts;

**Response: This has now been studied in detail. Reducing the ROW will not be feasible because the townhome lots depend on the ROW space to back-of-walk to meet FAR and the small house lots depend on it for the second parking space in front of the detached garages.**

- Wall details will help inform the city if the alley should be public;

**Response: Noted. See above.**

- Submittal of a variance from the requirement to construct Desborough is required.

**Response: As discussed with Kathy Bell, the city is offering to take on this task.**

6. Stormwater:

- There is not sufficient information to demonstrate the overall stormwater plan will meet code;

**Response: The cast-in-place detention tanks shown have been conservatively sized based on preliminary modeling. The storm design will be very complicated so note realistic to do a complete design for preliminary plat.**

- The stormwater plan doesn't address soils or wetland hydrology.

**Response: Wetland hydrology will be maintained per code. Currently the drainage ditch cuts off most flow to the wetlands as noted in the mitigation report. The storm outfall is proposed into the same ditch. Final design will involve more detailed modeling of this.**

- Vaults need to be constructed to meet aerial point loading requirements.

**Response: Noted.**

7. Fire:

- The alley must have an uninterrupted width of 16 feet, not the 15 feet shown;

**Response: Updated on section. (although Infill Toolkit code notes 15' alleys)**

- Building code will require the TH to be sprinklered if more than 4 units are attached in a cluster;

**Response: Noted.**

- Sussex exceeds allowed 12% grade on north end and would require all units to be sprinklered. Max 15% grade allowed with sprinklers.

**Response: Noted. Final grading will be very tricky; maintain drop across townhouses, avoid bedrock, and maintain wetland buffer. During final design it will be a goal to reduce grade so houses are not sprinklered, but unlikely to be successful.**

8. Open Space/Trail:

- The city will not accept dedication of the open space. The notations regarding dedication of these open space areas should be removed;

**Response: Noted. Open space is now proposed to be dedicated to a non-profit corporation.**

- Relocation of the trail alignment at Bristol is not supported and as shown appears to conflict with the proposed critical area mitigation plan.

**Response: The line this comment refers to is the toe of the 2:1 slope and limits of wetland buffer restoration. The trail alignment is proposed to remain on the existing alignment.**

9. Trail/Critical Areas:

- The city is still assessing the proposed trail alignments. As necessary, revisions to the critical area documents will be needed to address the impacts resulting from the east-west trail.

**Response: Call scheduled for week of 1/19/2021**

- Improvements to the north-south trail will likely require some grading and clearing in the wetland buffer. Revisions to the critical area documents should be made accordingly.

**Response: Critical area documents to be revised after decision on trail is made.**

- Show the proposed location of the 30' wide public trail easement to be dedicated to the City as required by the Parks, Recreation, and Open Space chapter of the City's Comprehensive Plan.

**Response: This has been noted on the plans.**

- Any trail segments to be improved or constructed by the applicant as part of this project shall be reviewed and approved by the Parks & Recreation Department and built to City standards.

**Response: Noted.**

10. Land Use:

- Setbacks shown for the SF cluster lots are incorrect, the front yard setback is 15 feet, not 10 feet.

**Response: Variance has been submitted on this. The project is trying to push the buildable area as close to the ROW as possible to limit impact on neighbors to the east.**

11. Infill Housing (ITK):

- The ITK applications need to be reconciled as it appears both small and smaller housing units are proposed;

**Response: Application has been updated to only include small houses.**

- Additionally the house square footage exceeds the allowable FAR for all smaller lots that have site areas less than 3,000 sf in area;

**Response: Proposal has been updated to only include small houses because open space did not work. See revised FAR and open space calculations. One lot was removed.**

- Need to demonstrate the parking requirements for each housing type and if only one space is provided for the small houses, then a departure must be requested;

**Response: Dimensions will be added to show greater than 20' between garage door and back of walk. This will make 2 parking spaces for each lot. A departure request has been included with this submittal.**

- FAR for small and smaller lots are calculated on a per lot basis;

**Response: This has been revised.**

- Revise the FAR calculation and exhibit to show only the TH lots-the alley and open space is not included in the FAR calculation.

**Response: This has been revised.**

12. Design Review:

- Staff has minor design comments that can be discussed at a later time.

**Response: Noted.**

Please feel free to contact me if you have any questions about these responses.

Sincerely,

Freeland and Associates, Inc.



Tony Freeland, P.E.

Encl.