April 3, 2018

Ms. Angelie Stahlnecker
Planning/Building Administrator
Mr. Jeff Boers
Principal Planner
City of Fircrest
115 Ramsdell Street
Fircrest, WA 98466-6999

RE: **Responses to Comments** - Determination of Incomplete Application
Chick-fil-A, Project Site No. 04046
6520 - 19th Street West, Fircrest, Washington
City of Fircrest Case No. 18-06

Dear Ms. Stahlnecker and Mr. Boers:

We have revised the plans and technical documents for the above-referenced project in accordance with the comments in your Determination of Incomplete Application letter dated March 20, 2018. Enclosed are the following documents for your review and approval:

1. Response letter to Determination of Incomplete Application dated March 20, 2018
2. Revised Plans dated 3-30-18
3. (2) LSI reports (one for each parcel)
4. Addendum Letter for the Geotechnical Report
5. (1) Geotechnical Report
6. Copy of Determination of Incomplete Application
7. Sewer Availability Email from City of Tacoma
8. Grease Interceptor Design Requirements from City of Tacoma
9. Drive-thru Sound Levels Report

The following outline provides each of the comments in italics exactly as written, along with a narrative response describing how each comment was addressed:

***In order for the application to be complete**, the following items must be provided;*

***1**. **Comment**: FMC 22.58.008(k) requires Low Impact Development (LID) components to be incorporated into the project design. If site conditions do not support infiltration, the project design will still be required to incorporate LID components to the extent practicable consistent with the LID Technical Guidance Manual for Puget Sound.*

The design should minimize impervious surface, maximize infiltration (if feasible), and provide water quality treatment by directing parking lot and circulation area runoff into landscape planting areas that are placed below pavement elevation — rather than using raised planters surrounded by curbing. A

technical assessment that evaluates soil suitability for LID needs to be submitted, and the site design elements must be redesigned to incorporate LID components.

Response: Based on a memo prepared by Terracon (March 26, 2018), infiltration on this site is not feasible due to the very low permeability of glacial till. Additionally, LID elements such as permeable pavement are classified as infeasible due to the "high use site" designation of the site (DOE Manual, Volume V, Chapter 5, BMP T5.15). Furthermore, the DOE manual states that Oil Control facilities are to be placed upstream of other facilities (DOE Manual, Volume V, Chapter 3, Section 3.2). As such, any run-off from the parking lot area will need to pass through an oil water separator prior to discharging to any water quality device.

Due to the topography of the land and limited site area, it will not be feasible to collect the stormwater and route it through and oil/water separator prior to discharging to an LID facility such as bio-retention or use dispersion. Based on this, the project proposes to route the roof areas through a bio-retention area prior to discharging as a means of achieving LID measures on-site to the maximum extent practicable while operating within the requirements of the DOE Manual.

2. ***Comment****: The TIA provides minimal analysis of parking demand on page 15 and no analysis of the extent to which the project will meet the purpose, intent and requirements set forth in FMC 22.60.006, restated below. In order for Staff to recommend approval of a parking variance, the applicant must show that (in addition to meeting the variance criteria in FMC 22.74.003):*

(a) A parking demand study prepared by a professional traffic engineer supports the need for increased parking and demonstrates that:

(1) Shared and combined parking opportunities in FMC 22.60.005 have been fully explored and will be utilized to the extent practicable;

Response: Shared parking was explored with neighboring properties but proved not feasible. In addition, FMC 22.60.005 does not apply to this project as it encourages reduction in required parking.

(2) On-site park and ride facilities have been fully explored and will be provided to the extent practicable;

Response: On-site park and ride is not necessary since a transit station is located across the street. In addition, all restaurant Operators encourage employees to carpool as well as use public transportation amenities. The request in increase in parking is still justified as it is consistent with other existing restaurants that encourage ride sharing.

(3) Commute trip reduction measures will be implemented, if required by state law, to the extent practicable.

Response: Commute trip reduction measures do not apply to a retail project.

(b) The project has been designed to include the following design elements, facilities and programs to the satisfaction of the planning commission. In those instances where site constraints impede compliance with the design requirements, written findings of fact shall be made identifying site and project constraints and included in the final notice of decision. In its findings, the planning commission shall determine if a good faith effort has been made in building and site design in order to accommodate the following design elements, facilities and programs.

(1) The excess parking spaces shall be located within an enclosed parking structure or constructed of a permeable surface such as interlocking paving blocks (cement or plastic) or other porous pavement which minimizes impervious surface and achieves a superior appearance when compared with a large expanse of asphalt or concrete paving.

Response: See response #1. LID elements such as permeable pavement are classified as infeasible due to the "high use site" designation of the site (DOE Manual, Volume V, Chapter 5, BMP T5.15). As such, any run-off from the parking lot area will need to pass through an oil water separator prior to discharging to any water quality device.

(2) Alternative parking lot designs shall be utilized in order to reduce impervious surface, e.g., one-way instead of two-way access aisles.

Response: One-way aisle circulation has been evaluated and determined that two-way aisle circulation provides better on-site circulation for vehicles. The following design elements have been incorporated into the site plan to minimize impervious surfaces.

a) Drive aisles widths have been designed to the 22' wide minimum code requirements.

b) Compact parking stall depths were decreased from 15' to 13'6".

c) The design minimizes regular parking stalls from 18' to 16'6".

d) The use of overhang parking was implemented to minimize impervious parking stall depths.

e) The minimum amount of landscaping required is 15% (or 8,019sf). The proposed site plan provides almost 27% (or 14,178sf). This equates to a difference of 80% increase in landscaping (almost double the requirement).

f) A dual drive-thru with a two-way drive aisle creates efficient on-site circulation and safe pedestrian connectivity. This prevents overflow on 19th St. or the public right-of-way.

(3) The amount of required landscaping within the area of additional parking shall be doubled. This additional landscape area may be dispersed throughout the parking lot.

Response: The amount of landscaping was increased to the maximum extent practicable. A landscaping buffer was widened along 19th St., in order to enhance the right-of-way and increase screening of the parking lot. The minimum amount of landscaping required is 15% (or 8,019sf). The proposed site plan provides almost 27% (or 14,178sf). This equates to a difference of 80% increase in landscaping (which is almost double the requirement).

(4) A minimum of 75 percent of the parking spaces shall be located behind the building, and the remainder shall not be located within the minimum and maximum yard setback areas adjoining a street. Parking lots located along flanking streets shall have added landscape and a superior design to strengthen pedestrian qualities; e.g., low walls, street furniture, seating areas, public art, etc.

Response: Providing 75% of the parking stalls is not feasible. The requested amount of parking stalls offers the highest use for public health and safety to the community. The proposed parking plan creates safe pedestrian connectivity and efficient traffic circulation. Providing adequate parking and sufficient drive-thru stacking will prevent traffic overflow in the public right-of-way or 19th St.

(5) Preferential parking shall be located near primary building entrances for employees who rideshare and for high occupancy vehicles, if applicable.

Response: Preferential parking is provided for 2 handicapped and a stall can be designated for high occupancy use.

(6) The developer shall create a transit/rideshare information center and place it in a conspicuous location on the premises.

Response: Transit/ride-share information will be placed in a location within the building for public viewing.

(7) *For sites located adjacent to or within 600 feet of a Pierce Transit bus or van route, the developer shall fund the purchase and installation of a transit shelter package, including seating, trash receptacle and related facilities for each side of the street which has a transit route, consistent with Pierce Transit operational needs in accordance with FMC 22.60.014.*

Response: Bus stops exist at the corner of 19th St and 64th Ave W which is within 600ft. The project is amenable to providing funding for a transit shelter package

3. *The TIA bases its parking analysis on a 4,706 square foot restaurant with drive-through and an average peak period parking demand rate of 9.98 vehicles per 1.000 sf per ITE. This analysis does not take into account any of the factors listed in FMC 22.60.006. For example, the site has direct public transit access on 19th Street and is located in close proximity to the TCC Pierce Transit Center. The restaurant is likely to draw a sizable portion of its customer base from students, faculty and staff at the TCC campus located across 19th Street from the site, where the large majority of the 13,700 students enrolled at TCC attend classes. The analysis should take into account the extent to which customers will walk from TCC to the restaurant. As the attached paper (Shoup) suggests, reliance on ITE demand rates absent meaningful project- and neighborhood-specific analyses will not produce any basis for the City to rely on in its analysis of the parking variance request.*

Response: The project site is located adjacent to public transit access on 19th and near the Tacoma College campus and Pierce Transit Center, and some customer draw will result from students, faculty, and staff. Those customers are expected to walk and drive/park; walking customers are expected to use the crosswalk at the signalized intersection of 19th Street E and E Mildred Street located one block to the west of the site.

The parking variance request does cite the *ITE Parking Generation manual* as one source of data to support the need for additional parking supply to meet anticipated demand. The *ITE Parking Generation manual* and a national adopted document that is utilized to estimate parking demand for a variety of land use types, including a variety of restaurants. The manual reflects a parking demand of 9.98 vehicles per 1,000 sf building area, which is used by many local, area, and regional agencies for establishing parking requirements for fast-food restaurants with a drive-through.

The City requested neighborhood specific information to support the parking variance. The table below summarizes the parking supply for 5 existing Chick-fil-A stores open in Washington state. The following data of other existing restaurants in Washington take into consideration local neighborhood characteristics that provide for pedestrian use (i.e. Fircrest neighborhood has schools, and bus stops). Based on the table, the average restaurant has approximately 1 stall per every 100sf. The request for 48 stalls is justified by the empirical data contained in the table below that summarized other existing open restaurants in Washington.

CFA Existing Washinton Locations			
Parking Summary			
Parking Supply			
City	**Address**	**SIZE (GSF)**	**Supplied # of Stalls**
Puyallup	104 39th Ave SW	4,770	50
Vancouver	16400 SE Mill Plain Blvd	4,625	36
Bothell	1220 228th Ave SE	4,546	40
Kirkland	12026 NE 124th St	4,570	53
Lynnwood	3026 196th St SW	4,526	49
AVERAGE		**4,607**	**46**

4. *Soils Information needs to be provided with respect to potential ASARCO Tacoma Smelter Plume contamination. Department of Ecology mapping identifies that the site falls within the 40.1 to 100.0 ppm arsenic concentration zone, which may trigger the need for testing and remediation under Ecology's Voluntary Cleanup Program.*

   Response: See attached Geotechnical and LSI reports included with this submittal.

5. *An exterior lighting plan needs to be submitted showing compliance with FMC 22.58.018. Circulation area and parking lot lighting should be designed to avoid conflicts with trees.*

   Response: A Photometric plan has been added to this resubmittal, see sheet PH-1.

6. *A sewer availability letter and pretreatment acceptance from City of Tacoma regarding sewer connection and grease interceptor/trap needs to be submitted.*

   Response: See attached emails from City of Tacoma included in this submittal

   a) Sewer: City of Tacoma sanitary sewer does appear available to the parcels in question and it appears sewer service is already provided to these parcels. The parcels in question appear to already be included in the interlocal agreement, and that would not change throughout redevelopment. City of Tacoma sewer connection review, storm connection review, and source control review will still be required as part of the project. Other right of way review may be required in relation to the project as well. See attached email from Ben Wells.

   b) Grease Interceptor: For projects with more than 40 seats, with drive-through window, or actively advertise takeout, than an appropriately sized gravity grease interceptor shall be required. For sites with under 40 seats, no drive-through and do not advertise takeout or delivery then a hydro-mechanical grease interceptor may be approved. See attached email from Shawn Madison.

      a. The applicant will comply with the sizing chart requirements for Grease Interceptors provided by the City of Tacoma (1,000gal minimum for this site). Chick-fil-A proposes a 1,500gal Grease Interceptor. See attached Utility Plan, sheet C2.0 for reference.

7. *Technical information needs to be provided demonstrating compliance with the drive-through design guidelines, specifically FMC 22.64.043 item (13), which states:*

   Limit sound emanating from ordering board speakers or other speaker systems to a level that is not audible from residentially used properties or detrimental to occupants of other nearby properties. At no time should any speaker system be audible above ambient noise levels beyond the property lines of the site.

   Response: The speaker system will not be detrimental to occupants of nearby properties for the following reasons:

      a) There are no residential properties adjacent to the subject property.

      b) The speaker system will project noise away from adjacent properties.

      c) The speaker systems incorporate the latest technology with automatic volume control which automatically reduces the noise level to ambient noise levels within the property. See attached Drive-Thru Sound Levels report by HME.

   In additional, *the following items need to be addressed prior to the preparation of the public hearing staff report in order to ensure compliance with applicable requirements:*

8. *The existing 19th Street sidewalk has a 5-foot width within the pubic street ROW. FMC 22.64.030 states that walkways should be a minimum of 8 feet along street frontages in office areas and 12 feet*

within major pedestrian-oriented commercial districts and developments. The current characteristics of the 19th Street corridor suggest the 8-foot standard (not the 12-foot standard) should apply. However, the plan set indicates there is typically only 7 feet within the ROW between curb and property line. The public sidewalk should be widened to 7-foot minimum along the property frontage.

Response: The sidewalk has been widened to 7-feet (measured from back of curb) accordingly. See SP-1.

9. *The proposed Norway maples should not be used in planter strips or parking lot peninsulas/islands less than 10 feet in width. Their use in wider planting areas is acceptable. Tree selections need to be consistent with the City's Approved Street Tree Palette. Given the expansiveness of the parking and circulation areas, the landscape plans should include trees that will achieve medium to large canopies.*

   Response: The maple has been substituted with a tree on the city of Fircrest approved street tree list.

10. *FMC 22.62.006(a) requires street tree spacing to be 30 feet on center, on average. Provide one additional tree in front of the building and one additional tree in front of the parking lot to meet this standard.*

    Response: Street tree spacing has been revised and trees have been added where requested.

11. *All parking lot landscape islands and peninsulas are required to have a minimum planting area of 120 SF and minimum width of 8 feet measured inside of curb to inside of curb.*

    Response: The landscape islands have been increased in size to meet the minimum requirements described.

12. *All tree islands and peninsulas within parking and circulation areas are required to have trees installed. Storm facilities will need to be redesigned to accommodate two trees in each of the two islands at the east ends of the centrally located parking stalls plus one tree in the tree island at the east end of the southernmost row of stalls near the entrance to the drive-through lanes.*

    Response: Trees have been added accordingly.

13. *FMC 22.64.020(a) states, in part: Ground floor retail and commercial spaces along a sidewalk, walkway or trail corridor should provide extensive amounts of display window space (at least 70 percent of the wall area up to nine feet above finished grade) to showcase commercial, retail or other public uses and wares in a storefront style typical of main street or marketplace architecture. Window glazing should be transparent to provide pedestrians views into ground floor spaces and activities. Storefront windows should be placed above a masonry, tile, wood or other durable material base that extends at least 24 inches above the adjacent sidewalk or exterior finished grade. The bottom of windows should be no more than four feet above the adjacent sidewalk or exterior finished grade.*

    Response: Storefront has been added exceeding the 70% minimum. Window sills have been raised to 2'. See exterior elevations sheets A-2.1 and A-2.2. Calculation legend has been provided.

14. *It appears that the front facade facing the street has roughly 36% window/door area and the east-facing façade facing the seating area has roughly 45% window/door area, well below the 70% specified. Please explore design modifications that would increase window/door glazing to more closely achieve the intent of this design guideline.*

    Response: Storefront glazing has been increased to 76% along 19th St. per sheet A-2.1. Storefront glazing has been increased to 84% along the east wall per sheet A-2.2 . Calculation legend has been provided. Glazing provided exceeds the 70% minimum requirement.

15. *Relocate proposed gas line along 19' Street frontage to avoid conflict with proposed street trees and other landscaping.*

Response: The gas line has been revised to be clear of proposed street trees.

16. *Parking shall not be located within maximum setback area (within 20 feet of the 19' Street ROW p/l) — when the number of parking stalls exceeds 120% of the minimum required. The stall located near the driveway entrance nearest the building will need to be shifted out of this setback area or removed.*

    Response: This parking stall has been removed accordingly.

17. *Revise the architectural design at the northeast (front) corner of the building to more effectively highlight the main customer entries and create a stronger architectural focus, per FMC 22.64.011.*

    Response: A trellis feature has been added to accentuate the main customer entry from the public right-of-way.

18. *Add functional canopies over front windows facing 19th Street per FMC 22.64.019. Extend depth of proposed canopies over windows on east side to improve their functionality.*

    Response: 4' deep continuous canopies have been added for uninterrupted weather protection.

We believe that the above responses, together with the enclosed revised plans and technical documents, address all of the comments in your Determination of Incomplete Application letter dated March 20, 2018. Please review and approve the enclosed at your earliest convenience. If you have questions or need additional information, please do not hesitate to contact me at this office. Thank you.

Regards,

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