

LAND TECHNOLOGIES, INC.

PLANNING • PERMITTING • ENGINEERING



Date: July 18, 2022

To:

City of Marysville
 Development Services
 80 Columbia Avenue
 Marysville, WA 98270

Response to Comments

Project Name: Lakewood PRD
 Project File Number: PA22-007
 Review Completion: March 15, 2022


CITY COMMENTS	LAND TECH RESPONSE
Community Development: Reviewer: Amy Hess, Senior Planner	
<p><u>Comments 1 through 23, and any major design or layout comments from other departments, will need to be addressed prior to the project being scheduled for consideration by the Hearing Examiner.</u></p>	
<p>1. Prior to issuing SEPA, comments pertaining to the environment must be addressed, a traffic concurrency recommendation must be issued by the City Engineer, and a letter accepting the traffic concurrency recommendation must be submitted to the City by the applicant. A traffic concurrency recommendation will be provided when the project's traffic impacts and any major road layout comments are resolved. The SEPA determination must be issued prior to scheduling the proposed plat and concurrent rezone for consideration by the Hearing</p>	

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Examiner.	
<p>2. The application materials indicate that a boundary line adjustment application will be submitted; however, it does not appear that the BLA has been submitted to-date. The BLA will need to be processed concurrently with the overall land use application, and will be subject to review by the City's Hearing Examiner. Please submit the BLA application with the resubmittal.</p>	<p>We did provide a proposed BLA Map but did not feel we should submit the BLA until the rezone was tentatively approved.</p> <p>The BLA has been now submitted—there was a minor change since this first submittal.</p>
<p>3. Please remove file number PreA21-050 on all sheets and replace with PA22-007.</p>	<p>PA 22-007 has been added on all sheets and reports.</p>
<p>4. The guest parking spaces located on the curve of road A shall be eliminated (spaces G197- 208) as it does not meet MMC 22G.080.080(2)(b)(iv), and may cause safety/sight distance issues.</p>	<p>Guest parking spaces along the curve of Road A have been removed.</p>
<p>5. Tract 590 appears to be for future right-of-way (ROW) dedication, though it is not included in the Tract Designation Table on sheet P3 of P5. ROW dedication and necessary improvements are required at time of plat development and cannot be set aside for future (see comments from Jesse Hannahs and Shane Whitney).</p>	<p>Tract 590 is just that; this tract was established just to allow for ROW Dedication when it was finally determined what would be required</p> <p>This ROW along this segment is now shown as dedicated and frontage improvements are shown. A detail is provided with the roundabout to confirm the ROW dedicated is adequate should a Roundabout get built in the future.</p>
<p>6. Pursuant to MMC 22G.090.050(1), all contiguous parcel of land, regardless of date of acquisition or location in different lots, tracts, parcels, tax lots or separate government lots, that are to be subdivided shall constitute a single subdivision. The following tax parcels will need to be included with this application: 31051900400900, 31051900401100, and 31051900401000.</p>	<p>MMC 22G.090.050(1) does clarify with intervening phases removed <i>"All contiguous parcels of land, ..., <u>that are to be subdivided</u>...shall constitute a single subdivision..."</i></p> <p>Note the words of the code that state it applies to parcels <i>"that are to be subdivided"</i> and not to <i>whole parcels with areas not being subdivided</i>.</p> <p>The BLA will help resolve this issue. On these parcels, we have two distinct zones. Whoever develops the MU zone will complete these frontage improvements—which is as it should be.</p>

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<p>7. Prior to completing review/approval of the critical area report submitted by Sewall Wetland Consulting, Inc. has the following deficiencies that need to be addressed:</p> <ul style="list-style-type: none"> • A scaled map identifying/depicting the wetland(s) boundaries and associated buffers will need to be submitted (consistent with the wetland delineation checklist). This request was also sent directly to Sewall Consulting. • The existing condition of the buffers shall be assessed and a recommendation for enhancement provided (if warranted by existing conditions). 	<p><i>Critical Area updated reports and planting plans will be submitted separately in about 2 weeks (last week of July)</i></p> <p>The critical area boundaries on the plat plans are per marker survey and are scaled. The CA will be providing a similar map in his report along with a Planting Plan for the farmed buffer of the offsite wetland.</p> <p>CA Consultant is preparing a planting plan for the buffer area of the offsite wetland. The onsite wetland is in a wooded area and will not need planting.</p>
<p>8. The critical areas buffer/Native Growth Protection Area (NGPA) portion of the wetland and buffers should be labeled as an NGPA on the site plan.</p>	<p>The label “NGPA” has been added on planning plans.</p>
<p>9. Pursuant to MMC 22G.080.100(4)(e), open space shall include a minimum of one large recreational amenity or two small recreational amenities per one-quarter acre of active recreation space. Small recreational amenities include commercial-grade benches, picnic tables, small play equipment, and similar amenities. Large recreational amenities include commercial-grade half sport courts, large play equipment, gazebos, and similar amenities. Please provide the total number of large and small amenities to be provided.</p>	<p>Active Open Space Required—1.24 acres Equals 5 ¼-acres</p> <p>Requires:5 large recreational Amenities and 10 small recreational amenities.</p> <p>Providing:</p> <ol style="list-style-type: none"> 1. Large reinforced grass turf areas for multi-sport type activities. 2. Grass reinforced Soccer Field 3. Grass reinforced Volley Ball Court 4. Grass reinforced Badminton Court 5. 2 Bocce Ball/Lawn Bowling Lanes. 6. Horseshoe Pit. 7. Large Play Equipment 8. Eleven Commercial Grade Benches 9. One Picnic Table
<p>10. The reference to ‘Active Open Space on Public Roads’ is somewhat confusing and it is not clear why it is included. Please provide further explanation, or remove if not necessary.</p>	<p>It was to clarify that, even though we vehemently disagree, the Active Open Space required was visible from the Public Road.</p> <p>We will take it off now to clear the confusion 😊</p>
<p>11. Tract 985 may need to be revised depending on the actual amount of ROW needed for construction of the Round About</p>	<p>Right of way updated and frontage improvements along 172nd St NE shown per Lakewood Neighborhood Plan.</p>

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<p>(RAB) at the intersection of 172nd Street NE and 11th Avenue NE (see comments from Jesse Hannahs and Shane Whitney). Revised open space calculations may be needed if the size/shape of this tract is changed</p>	<p>The RAB is not constructable given its intrusion into the properties on the NW and SW corners. These properties are also in Snohomish County—outside the City Limits Open Space Calculations are updated.</p>
<p>12. It does not appear that the topography adjacent to lots 165 and 173 in Tract 997 is compatible with a playground as is indicated on the landscape plan</p>	<p>Topography will be revised as needed. The Topography has not yet been “detailed” out pending a layout and Preliminary Plat Plan we can all accept.</p>
<p>13. Please see comments from Jesse Hannahs regarding ROW dedication, required construction of frontage improvements and roundabouts. ROW dedication for all improvements shall be required concurrent with this application.</p>	<p>Frontage improvements are shown where it is appropriate to this project. Dedications are also shown</p>
<p>14. Please see comments from Gurpreet Dhaliwal with Snohomish County regarding traffic mitigation fee calculation error, and revise accordingly.</p>	<p>This was resolved by project Traffic Consultant.</p>
<p>15. The small strip of land between lots 73, 74, 75 86, and 87 should be removed, as it is likely to become ‘ownerless’ and is not consistent with the CPTED standards.</p>	<p>This whole little area has been modified with the cul de sac now being a connecting road. The narrow area per the last layout is now 30’ wide and is to also provide a Stormwater Conveyance Easement. There is now one to the north of the center road segment (north of now lots 73 and 74) that is 17 feet wide and is to also provide for Stormwater Conveyance. This area does provide for rear or side access to the open space areas from adjacent lots. NAHB (National Association Home Builders) has conducted numerous surveys on homeowner preferences in all elements of preferences and one of those surveys did show that</p>
<p>16. Pursuant to LNMP Appendix A, Section B.3(2)(a), <u>The street edge shall be defined with buildings, landscaping or other features. Primary building entrance(s) shall face the street unless it is not feasible due to parcel size, topography, environmental conditions, or</u></p>	<p>A lot of work has been “done” on resolving this burdensome requirement. The resolution that was arrived at was to provide a minimum 10’ landscape buffer and Architectural Relief on these second street where the rear or the side of the home is visible to that street.</p>

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<p><u>other factors as determined by the director, and alternate design elements are incorporated into the facade which enliven the streetscape.</u> Buildings with individual ground floor entries should face the street and/or common open space to the extent possible. Buildings shall provide windows that face the street to provide “eyes on the street” for safety. To meet this requirement, at least 15 percent of the facade facing the street shall be occupied by transparent windows or doors.” <u>The standards cited require that single family residences have an orientation towards the street including entrances, pedestrian pathways, windows, etc. Specific direction is provided in comment 18 below.</u> On a case-by-case basis, the Director may allow landscaping/fencing in a permanently maintained easement in place of homes being oriented towards roadways. Final determination of the orientation of lots along 11th Avenue NE will be reviewed/determined at a later date.</p>	<p>This rule ignores the families that will live in these homes in favor of someone driving by—believing a passer-by is more important than the family in the home.</p> <p>This plan destroys Private Space for the family and exposes the home to a second entry (against CPTED) by the nefarious.</p> <p>Can refer to Newman “Defensible Space” guidelines pointing out that it is the residents in the community that will defend your property and not a passer-by on the street, especially Arterial Streets.</p> <p>These Standards are misdirected in that they require houses to have two primary doors, one to the residential street and another to the arterial or adjoining street. Contrary to the real guidelines of CPTED. These homes will all have an orientation towards “the street”—that is the residential street where there are neighbors that care and defend each other’s homes. Having double access, with one to an arterial where the passer-by has no familiarity with who belongs in the neighborhood or even cares about the neighborhood.</p> <p>We have a landscape tract and fence behind landscape and per meetings this was to be allowed on the project.</p>
<p>17. On the interior plat roads, the single-family residences should face the street. Where side yards need to abut the street along arterials or the interior plat roads, an architectural approach similar to what is shown below should be proposed in lieu of the house facing the street. In the example below, the front of the house is oriented towards the auto court while the elevation that faces the street has variation in siding, windows, trims, and a gable entry feature with decorative posts that gives the sense of the house being oriented towards the street. On lots that take access off of an auto court that have a side yard abutting the street, a pedestrian pathway should be provided to the street and auto court (lots 84, 89, 163, 168, and 145). This</p>	<p>This is a bit awkward but Developer willing to incorporate this on internal lots at corners</p> <p>The approaches have been add to lots 54, 66, 71, 76, 77, 80,85, 90, 99,120, 147, 158, 163, 168, 169, 179 and 182.</p>

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<p>orientation, coupled with a pedestrian pathway that connects both towards the autocourt and the sidewalk along the street side of the interior plat roads, meets the intent of the Lakewood Neighborhood Master Plan design guidelines, and preserves private back yards.</p>	 <p>This part is not overly burdensome and does not open homes to the second door being on an outside street where “not-so-good strangers” would have a direct path to a home unobserved by the “Neighborhood Watchdogs”.</p>
<p>18. Please see comments from Assistant Fire Marshall, David VanBeek, regarding a required cul-de-sac turnaround at the dead-end of Road A. Please see comments from Jesse Hannahs regarding roadway connections.</p>	<p>Not sure what he is talking about here, will have to call David—Road A, as revised, has no dead-ends.</p>
<p>19. Panhandle lots; the minimum width for a panhandle access is 20 feet. Please amend lots 67, 73, 113.</p>	<p>Any panhandles or Shared Driveways are now 20’ wide. Lot 113 was 15’ but fixed.</p>
<p>20. Pursuant to the <i>Lakewood Neighborhood Master Plan</i> (LNMP) Appendix A, Section B.12, <i>Street connectivity</i>: (1) The street system of proposed development shall be designed to connect with existing, proposed, and planned streets outside of the development. Wherever a proposed development abuts unplatted land or other land with the capability of being further subdivided, street stubs shall be provided to allow access to future abutting subdivisions and to logically extend the street system into the surrounding area. All street stubs shall be provided with a</p>	

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<p>temporary turnaround unless specifically exempted by the fire Marshall, and the restoration and extension of the street shall be the responsibility of any future developer of the abutting land. (3) New development shall provide an integrated and connected network of streets to provide “direct” walking route options, orientation, a sense of place, and multiple travel route options. A street network dominated by long, irregular loop roads and cul-de-sacs is not appropriate. Blocks shall be designed to provide vehicular connections at intervals no greater than 600 feet and pedestrian access at intervals no greater than 300 feet (200 feet is preferred). <u>Amend the plans to provide pedestrian connectivity consistent with this requirement. Amend the plans to include connections to 172nd Street and adjacent parcels as noted by Jesse Hannahs and Shane Whitney.</u> A crosswalk on 172nd Street, near the Gas Station's western driveway, will be required.</p>	<p>Pedestrian Connections proposed are relevant to this project</p>
<p>21. Pursuant to MMC Section 22G.080.070, the single-family residential lots shall have at least 200 square feet of private open space set aside as private space for that dwelling unit. No dimension of such open space shall be less than 10 feet. <u>Please delineate the open space for each lot.</u></p>	<p>The backyards seem pretty obvious as each lot has 800 sf of backyard “private open space” So as to not clutter the plans with more markings, we have provided a “Typical” detail showing the typical private open space.</p>
<p>22. <u>The following revisions to the landscape plan are needed:</u></p> <ul style="list-style-type: none"> ▪ Pursuant to MMC Section 22G.080.050(2)(i), "Landscaping shall be provided for public and semipublic spaces and shall integrate them with private spaces. Landscaping shall create a pleasant streetscape and provide connectivity between homes and common areas using trees, shrubs, and groundcover through the 	<p>NOTE: updated Landscape Plans to come</p> <p>Landscape streets and areas do meet the intent of this provision</p>

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<p>development and providing for shade and visual relief while maintaining a clear line of sight throughout the public and semi-public spaces." Please amend the plans to provide landscaping meeting the intent of this provision.</p> <ul style="list-style-type: none"> ■ Pursuant to MMC Section 22G.080.100, "Fencing and/or landscaping shall separate, while maintaining visual observability of, recreation areas from public streets, parking areas and driveways." Please amend to provide. ■ Street trees will be required along 11th Avenue NE, any portion of 172nd Street NE that requires improvement, and internal plat roads. ■ Please provide details on any trails/paths, surfacing, paving, etc. that is proposed in the open space areas. Trails must be a minimum of five feet wide, meet Americans with Disabilities Act (ADA) standards, and be improved with an appropriate all-weather surface (gravel does not qualify) 	<p>Fencing modified to provide 3' to 4' solid and 2' to 3' lattice.</p> <p>Understood</p> <p>Shouldn't this be part of Construction Plans</p>
<p>23. Pursuant to LNMP Appendix A, Section B.3, <i>Site and building design standards</i>, subsection 5: The development will be required to demonstrate compliance with the Site Design Utilizing Crime Prevention through Environmental Design (CPTED) Principles. The following CPTED strategies shall be incorporated into the building design and site layout. Please provide a brief written narrative response that addresses these criteria and amend the plans, as necessary.</p> <ul style="list-style-type: none"> ■ Access Control. Guidance of people coming and going from a building or site by placement of real and perceived barriers. Provision of natural access control limits access and increases natural surveillance to restrict criminal intrusion, especially into areas that are not readily observable. ■ Surveillance. Placement of features, uses, activities, and people to maximize 	<p>We did provide a detailed narrative on CPTED on page 7 and 8 of 12 in the Narrative Submitted with this project. We will copy that portion and add it to this Response Document versus copying into this Response Table format.</p> <p>See attached portion of Narrative on CPTED. In brief, we are controlling access to homes by restricting entry points into the homes. Entries into homes are restricted to the neighborhood side. A "neighbor" knows who belongs in the community and who doesn't. Formal "Neighborhood Watch" programs have been set up over this very principal.</p> <p>Surveillable by interested observers is a key component. Entries, Open Spaces, Recreational</p>

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<p>visibility. Provision of natural surveillance helps to create environments where there is plenty of opportunity for people engaged in their normal behavior to observe the space around them.</p> <ul style="list-style-type: none"> ■ Territoriality/Ownership. Delineation of private space from semi-public and public spaces that creates a sense of ownership. Techniques that reduce the perception of areas as "ownerless" and, therefore, available for undesirable uses (see comment 15 above). 	<p>Areas should be observable from nearby homes that have people interested in defending their community. Every "square inch" of proposed OS observable from the community roads or are surrounded by homes. Backyard fences are designed to restrict vision into the yards but allow those inside to see out.</p> <p>Proposal strives to do just this. Keeping entry to "backyards/Private Space" through the homes yells "sense of ownership". Landscaping and/or decorative fences will delineate OS along roads. Homes with no more than 4' solid fence and lattice above that will delineate park areas while providing for community surveillance.</p>
<p><u>The following comments are provided for informational purposes at this time:</u></p>	
<p>24. Please see comments from Shane Whitney regarding current lack of sewer availability.</p>	<p>For sure, no sewer no plat. Trunkline extensions are in the works including working with BNRR for crossing under the tracks—Boring Contractors are providing input.</p>
<p>25. Prior to final PRD subdivision approval, the applicant shall submit to the city, for its approval, covenants, deed restrictions, homeowners' association bylaws, and/or other documents providing for preservation and maintenance of all common open space, parking areas, walkways, landscaping, signs, lights, roads and community facilities at the cost of the property owners in the PRD consistent with MMC Section 22G.080.120. All common areas and facilities shall be continuously maintained at a minimum standard at least equal to that required by the city, and shall be approved by the city at the time of initial occupancy.</p>	<p>Understood—CC&Rs to be provided.</p>
<p>26. Please see comments from Scott Ritterbush, Planning Project Manager for Community Transit, related to future bus stops.</p>	<p>Did review comments and we would agree the informal Bus Stop west of the 11th intersection is not "ideal". It would not be "Ideal" to put the bus stop in the approach to the roundabout. It is not something we will offer.</p>
<p>27. Please see comments from the Lakewood</p>	<p>This project is not going to build bus stops internal to the plat, this is backward thinking.</p>

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<p>School District regarding the proposal.</p>	<p>First, there will be a formal crossing/Crosswalk put in at 11th and 172nd with either a temporary stop light or a future roundabout.</p> <p>A second crosswalk has been requested at the entry to the plat west of the existing store and gas station. Students are running across the road all the time now to get to the store during school hours.</p> <p>Students from this Community will be walking to school.</p>
<p>28. Prior to civil construction plan approval, the applicant shall demonstrate that the natural topography of the site is preserved to the extent feasible, and that the proposal complies with the design criteria outlined in MMC Section 22D.050.030(4). The applicant shall design the project to ensure a smooth transition to neighboring sites.</p>	<p>In interest to costs, staying with the natural topography to the extent feasible is always the goal. Unfortunately, offsite gravity flow storm and sewer elevations receiving discharges from the site end up “controlling” what can be considered “extent feasible”.</p>
<p>29. Overhead utilities on all frontages on 172nd Street and 11th Avenue shall be placed underground.</p>	<p>Thank goodness power lines on 172nd are on opposite side of road.</p> <p>Power lines on 11th are on the project side of the road will have to be put underground.</p> <p>Get ahead of permit to underground across 172nd</p>
<p>30. Shared access driveways/autocourts will be required to be paved with concrete, colored concrete, or similar decorative paving. This note will need to be added to the civil construction plans.</p>	<p>Understood—images on plans denote other surfacing materials for AutoCourts and Shared Driveways.</p>
<p>31. The applicant shall be required to obtain all necessary Federal, State and local permits for any critical area or buffer impacts prior to commencing construction.</p>	<p>Understood</p>
<p>32. Decorative street lighting shall be provided where required by the City's Traffic Engineer Manager pursuant to LNMP, Appendix B, Section B.1, Decorative Street Lighting Standards.</p>	<p>Decorative street standards planned for 172nd frontage.</p>
<p>33. The project will be subject to <i>Lakewood Neighborhood Master Plan, Appendix A -</i></p>	<p>Understood</p>

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<p><i>Design Standards.</i></p> <ul style="list-style-type: none"> ▪ <i>B. 8 Maintenance or dedication of open space</i> ▪ <i>B.11 Fences</i> ▪ <i>B.12 Street Connectivity</i> 	
<p>34. Prior to beginning construction, the applicant shall prepare an arborist report for the project that evaluates any on-site trees that are proposed for retention that are within striking distance of project improvements, and any off-site or shared trees that are located along the common property lines. During project construction, a certified arborist may be required to monitor impacts to trees along the shared property lines. Prior to a final plat approval, a certified arborist shall do a final evaluation of the trees that will be retained along the common property lines and make a written recommendation in regards to the treatment of the treed areas.</p>	<p>Understood—an Arborist Report to be provided prior to Construction</p>
<p>35. To provide the best protection for trees within the on-site critical areas that may be impacted during the construction stage, the applicant shall install a temporary, five-foot high, orange clearing limits construction fence in a line generally corresponding to the drip line of any significant tree(s) to be retained. No construction will be permitted within the dripline of trees identified to be saved. All such fencing shall be installed and inspected by the Community Development Department prior to commencement of site work.</p>	<p>Orange Construction Fencing to be installed—this fencing is not 5' high.</p>
<p>36. A landscape maintenance security shall be required for a minimum duration of two growing seasons (March through October). Invoices/receipts shall be submitted when the landscaping work is complete so that a security amount can be calculated. The security will be required to be on forms provided by the Community Development</p>	<p>Two year Landscape Security to be provided</p>

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<p>Department, and will be required to be submitted prior to final plat approval (see MMC Section 22C.120.060).</p>	
<p>37.A wetland maintenance security will be required pursuant to MMC Section 22E.010.160(2). The security shall be provided for a period of five years and monitoring reports shall be submitted per the schedule outlined in MMC Section 22E.010.160(2). Invoices/receipts shall be submitted when the mitigation work is complete so that a security amount can be calculated. The security will be required to be on forms provided by the Community Development Department, and will be required to be submitted prior to final plat approval (see MMC Section 22C.120.060).</p>	<p>Wetland maintenance security to be provided.</p>
<p>38.The critical areas and associated buffers shall be placed in a separate tract (Native Growth Protection Area or NGPA tract) on which development is prohibited. The location and limitations associated with the critical area and its associated buffer shall be shown on the face of the deed or plat applicable to the property and shall be recorded with the Snohomish County Auditor as required by MMC Section 22E.010.350(2).</p>	<p>Question to get clarified. Does this mean the Cat III wetland are should have a separate tract round the buffer and the rest of the proposed tract have a second buffer?</p>
<p>39.Wetland fencing and signage shall be installed adjacent to the protected NGPA tract. Two-rail fencing shall be constructed with pressure treated posts and rails and cemented into the ground with either cedar or treated rails. Signs designating the presence of an environmentally sensitive area shall be posted along the buffer boundary at a minimum rate of one every 100 lineal feet (see MMC Section 22E.010.370).</p>	<p>Two-rail split rail fencing proposed around CA buffers.</p>
<p>Public Works: Reviewer: Shane Whitney, Civil Plan Review</p>	
<p>1. <u>Existing utilities:</u> a. Sanitary sewer: A sewer extension is</p>	<p>After many years of “haggling” with a property owner on 156th about sewer trunk line</p>

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<p>proposed in the next few years from 164th ST NE north, along the east side of the Railroad tracks. There is existing sewer along 172nd ST NE but is unfortunately at capacity.</p> <p>b. Water: There currently is a 12” cast iron water main running along 172nd ST NE and can be found on record drawing W775.</p> <p>c. Storm: Storm currently runs along 172nd ST NE and can be found on record drawing RD282.</p>	<p>easements, it looks like there may finally be resolution. We had plans for sewer from 156th to this site and the first leg from the 156th property owner was one submittal from being approved.</p> <p>Now we understand, the purchaser of that property is planning on installing that leg may even yet this summer. If that does not happen, we will be looking at a pump station.</p> <p>Thank you on water and storm, we will perfect water and storm drawings with PP approval but have concepts with this PP submittal.</p>
<p>2. Per MMC 14.03.250, utilities are to be extended along the street frontages of the proposed project.</p> <p>a. Sewer will need to be extended along the project frontage along 172nd ST NE and along 11th Ave NE.</p> <p>b. Water and storm currently front the project along 172nd ST NE but will need to be extended along 11th Ave NE.</p>	<p>We have worked out routing with City Engineer that will cover all relevant frontage.</p> <p>Water will be extended as is relevant to the UGA and future land use/zoning.</p>
<p>3. <u>Frontage Improvements:</u> Frontage improvements are required per MMC 12.02A.090 on all projects. Frontage improvements are described as curbs, gutters, and sidewalks; underground storm drainage facilities; patching the street from its preexisting edge to the new curb line; and overlayment of the existing public street to its centerline.</p> <p>a. For the required improvements of 172nd Street NE, the Traffic Engineer has provided the required guidance within his response letter.</p> <p>b. 11th Ave NE is considered a local access street and should be build compliant with SP 3-202-002 of the EDDS.</p> <p>c. All required frontage improvements shall be constructed prior to final plat approval.</p>	<p>Frontage improvements per the LDMP are provided where is project fronts on 172nd.</p> <p>This is as proposed.</p> <p>Understood.</p>
<p>4. <u>Dedication Requirements:</u></p>	

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<ul style="list-style-type: none"> a. Dedication requirements will vary along 172nd in accordance to the Lakewood Neighborhood Master Plan. There are three sections of this development that will need to be dedicated. The piece furthest to the west will require a 12.5' dedication. The section west of the Gas Station will require a 4.5' dedication and the section east of the Gas Station will require a 4.5' dedication. b. It appears that 11th Ave NE has an adequate dedication already in place. c. Any additional area for the future roundabout at 172nd and 11th shall be added as necessary. d. The new City streets shall be dedicated to the City. In addition, the Traffic Engineer has noted that additional connection opportunities to adjacent properties will be necessary. e. The roadway that will be improved along the gas station will also need to be dedicated to the City. 	<p>Dedications for specific to this project will be made per the LNMP. Any frontages not part of this project will be by future development.</p> <p>As is shown on plans.</p> <p>Future Roundabout Design is provided and proposed dedications per that design criteria are shown.</p> <p>After several meetings, the practical road alignments have been settled and are as per this submitted plan</p> <p>That is part of the plan and agreements with the landowner</p>
<p>5. <u>Access:</u></p> <ul style="list-style-type: none"> a. The new service roads for a PRD shall be constructed to SP 3-218-001 of the EDDS. b. Auto courts are permitted in a PRD. The auto court is to be built per the private road profile, SP3-202-004, with decorative concrete or stamped asphalt. They shall serve 6 lots maximum and shall not access from an arterial street or from a cul-de-sac. c. The southern access onto 11th Ave will need to meet the spacing requirement from the future roundabout. d. The minimum width of a residential driveway is 12-feet and the maximum is 26- feet. Curb cuts for driveways shall be limited to a 20-foot maximum. e. Please provide a conceptual drawing 	<p>Understood</p> <p>Understood, plans show different surface treatments</p> <p>Meets Separation requirements</p> <p>Understood—that is per proposal</p>

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<p>of the roundabout located at the intersection of 11th Ave NE and 172nd St NE.</p> <p>f. Please note that the Lakewood Neighborhood Master Plan includes a crosswalk located near the Gas station's western driveway (proposed new access street).</p>	<p>Conceptual Drawing of Roundabout is shown on P3. Cannot be built at this time.</p> <p>Understood and is practical.</p>
<p>6. Drainage: All projects in the city of Marysville must comply with requirements stipulated under the MMC 14.15.040 and 14.15.050.</p> <p>a. Stormwater drainage: The city has adopted the 2012 Ecology Manual as amended in 2014. In the next submittal we will require the following revisions be made to the stormwater site plan:</p> <ul style="list-style-type: none"> • Please supply a pre and post developed basin map. • In the narrative portion, there was note of a bypass basin but I was unable to see in the calculations where the bypass was modeled or that the increased runoff was being accounted for within the sites stormwater system. • It may be necessary to either change the grading on the north lots or install some type of interceptor to ensure that we don't push runoff to the adjacent parcel. • A conveyance analysis will be necessary at time of the civil submittal. <p>A geotechnical report was submitted.</p> <p>d. The maximum allowed impervious surface lot coverage for a PRD is 70%.</p>	<p>Got it</p> <p>Understood</p> <p>Basin map provided in Figure 6 with east and west TDA shown.</p> <p>By pass areas shown on Map (Figure 7). Two areas shown one in the NE corner where homes on lots 129 to 137 roof tops are directed to the buffer of the offsite wetland. The other by-pass is the existing home and lot in the SW corner of the site. This existing home and lot are just counted as by-pass of the existing/proposed condition being "equal".</p> <p>If anything, the drainage to the north may be reduced. The rooftops and driveways are draining to the street and the backyards will have BMP 513 soils which would attenuate flows from any runoff from the backyards. Existing drainage is to the NE feeding the wetland along the east side of that parcel.</p> <p>Understood, Conveyance analysis to be provided.</p> <p>70% is attainable, flirting with 50% per proposal</p>
<p>Other Comments:</p>	
<p>7. The overhead utilities along 11th Ave NE shall be placed underground</p>	<p>In the plans and work with WSDOT has started.</p>

CITY COMMENTS	LAND TECH RESPONSE
8. Trench restoration is to be completed in accordance with section 3-703 of the EDDS. A full lane or full street overlay may be required.	Understood.
9. As the Sather project is not currently proposing to extend sewer in 19 th Ave. NE, the project does not have a clear path for sewer availability.	Sather Farm has proposed an alternate route for sewer for that project "just in case" the landowner to the south delays the sewer extension from 156 th . There are easements for the Trunk line from 164 th future ROW across Sather Farm and across the Hanson Sisters property on the NE corner of 19 th and 172 nd .
10. A complete comprehensive review of the plans and stormwater site plan will be completed with the civil plan submittal.	Looking forward to that day 😊
11. The onsite grading and placement of any retaining walls must be compliant with section 22D.050.030 of the MMC.	Onsite grading and retaining walls will be per MMC 22D.050.030.
12. A right of way use permit for all work proposed within City right of way is required. Cost for the ROW permit is \$250.00. ROW permit fees must be paid before right of way permit issuance.	Thank you
Fire District: Reviewer: David VanBeek, Assistant Fire Marshal	
<i>Revision of the civil water plan will be required.</i>	Final engineering will provide acceptable civil water plan
<i>Access appears acceptable.</i>	Thank you
The plans include a preliminary utility plan with six fire hydrants shown. The hydrant plan is deficient. Additional fire hydrants will be required, with one required at all intersections, and additionally, between intersections to achieve spacing of no more than 600' apart maximum. <i>Estimate ten fire hydrants will be required.</i>	Fire Hydrants added per directions
Water main extensions with approved fire hydrant locations are required internally, and along the 11 th Ave NE frontage. <i>Maximum hydrant spacing is 600' apart.</i>	Water main to be extended to north road intersection as beyond that is just wetlands and the City Limits. Marysville does not have service agreements into the County.

CITY COMMENTS	LAND TECH RESPONSE
No information about available fire flow is provided for any fire hydrants near this site. The minimum fire flow required for the site is 1,000 gpm for SF residential use.	Fire Flow Test showed GPM@20 psi: 3076.
6. The minimum required fire flow for hydrants protecting SFR dwellings is 1,000 gpm (with 20-psi minimum residual pressure) for dwellings not exceeding 3,600 SF fire area.	Buildings would be under 3,600 sf and flow test show there is adequate flows
7. The minimum required fire flow for dwellings exceeding 3,600 SF fire area is 1,500 gpm	No homes to exceed 3,600 sf
8. Fire hydrants on an approved circulating/looped water main extension are required within the site for this development. Provide water main extensions with hydrants along the new roadways and at all road intersections in approved locations, with maximum spacing of 600 feet apart. Fire hydrants with approved water supply and access must be in service prior to building construction. Estimate that ten hydrants minimum will be required.	Understood
13. Where residential fire sprinklers may be required the developer should install a water service per Standard Plan 2-090-001 Full %" x 1" Meter Service. Under this plan a 1" tap is made at the water main and 1" piping is run to the 1" meter setter. If in the end a %" water meter will suffice then all that is required is to install two reducer bushings with the %" water meter. A single service tap should be used where sprinklers are required, not a double service installation.	Fire suppression should not be required at this time.
17. Recommend the roadways be posted "NO PARKING" where needed to maintain unobstructed emergency access	Private roads or Auto Court roads to have no parking signs
Public Works: Reviewer: Jesse Hannahs, P.E., Traffic Engineer Manager	
1) Traffic impact fees will be required from the City and depending on trip generation/distribution, may be required from the County and State.	

CITY COMMENTS	LAND TECH RESPONSE
<p>2) A Traffic Impact Analysis (TIA) will be required.</p> <ul style="list-style-type: none"> a. This would include, for City approval, development of trip generation/distribution followed after City review/approval by identification of impacts and, where required, mitigation approaches. <ul style="list-style-type: none"> i. Trip Generation: <ul style="list-style-type: none"> 1. Trip Generation shall be assumed for full buildout of all contiguously owned parcels and/or portions of parcels. b. TIA should follow City guidelines to be provided. <ul style="list-style-type: none"> i. Intersection Analysis: <ul style="list-style-type: none"> 1. WSDOT may request analysis of I-5 Interchange signalized intersections on 172nd ST NE (SR 531). 2. The City of Arlington/WSDOT may request intersection analysis for Smokey Point Blvd. & 172nd ST NE (SR 531). c. TIA shall include analysis of full buildout of all contiguously owned parcels including portion of property(s) zoned mixed use and existing gas-station. <ul style="list-style-type: none"> i. Trip generation should be assumed to maximum density likely to be constructed in order for TIA to not be required for substantial update if final development trip generation is greater than that assumed for this TIA. d. Mitigation: <ul style="list-style-type: none"> i. As TIA currently is evaluated with Trip generation not including all contiguously owned parcels, construction of 172nd ST NE (SR 531) & 11th Ave NE and 172nd St NE (SR 531) & 19th Ave NE roundabouts will be required. 	<p>TIA provided</p> <p>Included in TIA</p> <p>Roundabouts not legally required to be built by developer—not possible at 11th and not at all reasonable at 19th segment on east side of Tracks</p>
<p>3) Frontage improvements shall be required upon all frontages of all contiguously owned parcels including gas station parcel with roadways of 11th Ave NE and 172nd ST NE frontage improvements required including additional asphalt pavement, curb, gutter, landscape strip, sidewalk and street lighting.</p> <ul style="list-style-type: none"> a. 11th Ave NE: <ul style="list-style-type: none"> i. Roadway shall be per EDDS Standard Plan for 50' ROW residential roadway with 28' of asphalt width including curb/gutter, landscape strip, sidewalk and street lighting. b. 172nd ST NE: <ul style="list-style-type: none"> i. Roadway shall be per EDDS Standard Plan 3-201-005 with three lanes including curb/gutter, landscape strip, 12' multi-use paths on both sides and street lighting. ii. Frontage improvements upon 172nd St NE near BNSF mainline must be compatible with City effort to establish a future Quiet zone at 	<p>Not legal and not consistent with real reading of the Code.</p> <p>As proposed</p> <p>As proposed along Residential Project Frontage but not along MU outside project frontage.</p> <p>These improvement should be on the developer of the MU property.</p>

CITY COMMENTS	LAND TECH RESPONSE
<p>the at-grade crossing.</p> <p>c. 172nd ST NE & 11th Ave NE Roundabout:</p> <ul style="list-style-type: none"> i. Comp Plan calls for a four-leg single-lane roundabout at this location. ii. Development shall be required to provide preliminary design of the roundabout in order to determine footprint and thus necessary ROW for full construction. iii. Development shall be required to construct roundabout. <p>d. 172nd ST NE & 19th Ave NE Roundabout:</p> <ul style="list-style-type: none"> i. Comp Plan calls for a four-leg multiple (east of 19th Ave NE)/single (west of 19th Ave NE)-lane roundabout at this location. ii. Development shall be required to construct roundabout if other developments required to construct roundabout do not construct prior to the Gemmer Development. 	<p>Preliminary Design provided and ROW to be dedicated per this design</p> <p>At City's Cost? A roundabout cannot be built as this requires dedication of ROW from properties not in the City. Temp stop light proposed until RA can be built</p> <p>Talking about 19th east of tracks or west of tracks? Not even practical west of tracks</p> <p>This is not developers responsibility to provide per State Law.</p>
<p>4) Lakewood Master Plan designated Connector Roadways or City approved alternates shall constructed upon development parcels as portion of development internal roadway system including:</p> <ul style="list-style-type: none"> a. 176th ST NE from 11th Ave NE to 19th Ave NE b. 174th ST NE from 11th Ave NE to 19th DR NE c. 12th Ave NE from 172nd ST NE to 176th ST NE d. 19th DR NE from 172nd ST NE to 176th ST NE <p>Internal roadway structure shall provide for ability to serve future development of adjacent parcels with access other than directly to 172nd St NE.</p>	<p>Not practical--road grid that basically serves nothing. Runs into RR and Wetlands. The roads shown on plans are what has been agreed to as "approved alternates".</p>
<p>5) Arterial Access Management Standards apply per EDDS Section 3-301:</p> <ul style="list-style-type: none"> a. 11th Ave NE full access shall be spaced a minimum of 250' from the roundabout at 172nd St NE & 11th Ave NE. b. Access points/public road connections onto 172nd ST NE (SR 531), in addition to the City are subject to review/approval from WSDOT. <ul style="list-style-type: none"> i. Proposed access points/public road connections onto 172nd ST NE shall align with existing driveways and/or public roadways or meet spacing criteria. 1. While the Lakewood master plan designates 12th Ave NE to be located along western boundary of 1507 172nd Ave NE property, proposed location to immediate west of gas station aligned with Lakewood High School driveway is likely more ideal. <ul style="list-style-type: none"> a. Existing access to gas station under proposed layout should be required to be provided as a public roadway upgraded to City standard. 	<p>Road B intersection with 11th is 280 feet from ROW with 172nd</p> <p>We have proposed one access that is directly across from a school access location</p> <p>That is what is expected and proposed.</p>

CITY COMMENTS	LAND TECH RESPONSE
<p>6) Per EDDS 3-506, street lighting will be required upon all public street frontages as part of civil construction plans.</p> <p>a. Street lighting on 172nd ST NE shall be required as decorative style street light assemblies with LED fixtures to match existing fixtures on each street.</p> <p>i. 172th ST NE shall be designed as Principal Arterial/Commercial.</p> <p>ii. Fixtures would be Lumec Renaissance Series per to be provided City Specification.</p> <p>1. Specification should be requested via emailed to jhannahs@marysvillewa.gov</p> <p>2. PUD street lighting shall not be installed in Lakewood area upon arterial or connector roadways.</p> <p>iii. Lighting design shall incorporate fixture wattage to match those already installed upon each respective roadway.</p> <p>iv. Photometric layouts shall be required for design with photometrics consisting of staggered lighting on both sides of each roadway and development to install only street lighting on frontage side of each roadway.</p> <p>b. Street Lighting upon residential streets of 11th Ave NE and all internal roadways shall be PUD installed fiberglass pole installation type street lighting.</p> <p>i. Street shall be designed as collector arterial utilizing 100 watt equivalent LED fixtures.</p> <p>ii. Spacing of fixtures should be approximately 180'-220'.</p> <p>iii. As part of civil construction approval proposed PUD street lighting locations shall be provided by the City for inclusion within the PUD site electrical plans for City review.</p> <p>iv. Contact Eddie Haugen of Snohomish County PUD at (425) 7838276 or wehaugen@snopud.com for more information regarding PUD street lighting.</p>	<p>Decorative lights per LNMP locations shown on plans</p> <p>So noted</p>
<p>7) Channelization and Signing Plan shall be required as part of civil construction plans for all public roadways</p>	<p>Civil concept plans do show locations of light standards</p>
<p>Public Works: Reviewer: Brooke Ensor, NPDES Coordinator</p>	
<p>1. The City has adopted the 2012 Stormwater Management Manual for Western Washington, as amended in 2014 (2014 Manual), as our design standard. All projects must conform to these standards and use Low Impact Development techniques when feasible</p>	<p>As submitted</p>

CITY COMMENTS	LAND TECH RESPONSE
<p>2. If your project triggers Minimum Requirement #6 Runoff Treatment, please refer to Marysville Municipal Code section 14.15.050 for treatment type thresholds.</p>	<p>Thank you</p>
<p>3. For residential projects triggering minimum requirements #6 Runoff Treatment and #7 Flow Control, the stormwater facility lot will be dedicated to the HOA when park amenities are provided on the lot. Landscaping will be the responsibility of the HOA to maintain. The City will receive an easement to maintain the hard infrastructure. This policy may be modified depending on facility design.</p>	<p>Understood</p>
<p>4. For residential projects triggering minimum requirements #6 Runoff Treatment and #7 Flow Control, the stormwater facility lot will be dedicated to the HOA when park amenities are provided on the lot. Landscaping will be the responsibility of the HOA to maintain. The City will receive an easement to maintain the hard infrastructure. This policy may be modified depending on facility design.</p>	<p>Understood</p>
<p>5. City requirements do not negate any other state or federal requirements that may apply.</p>	<p>Understood</p>
<p>6. Bio-Cells A, C and D control structures are not accessible for maintenance. Please provide access to these structures.</p>	<p>Control Structure locations modified to be accessible.</p>
<ul style="list-style-type: none"> • Clarify or revise • Page C6 has labels for a Bio-Cell floor elevation on Tracts 991, 994, 993, 995, and Lot 158. The following pages do not show bio-cells in those locations. • Pg C15, CB-1004 On the profile it shows the east out pipe elevation at 153.3 but the bioretention bottom is listed at 154.00. • The geotech report indicates that groundwater or perched groundwater was intercepted between 1.5 and 3.75 feet below grade. It is unclear if the underdrains for these stormwater facilities will intercept and collect that water. 	<p>Perfections and details to be provided with Civil Plans.</p> <p>Significant grading and new surface coverages will change the pattern of interflow on this site. This is technically not “groundwater” which is saturated flow in the Phreatic Zone. This is unsaturated flows in the Vadose Zone or interflow. This water can be managed as needed or the cells may be lined.</p>

CITY COMMENTS	LAND TECH RESPONSE
<p>Community Transit: Reviewer: Scott Ritterbusdh, Planning Project Manager Phone: 425.521.5341 Cell: 425.327.0201 sritterbush@cintrans.org</p>	
<p>We currently have a substandard bus stop on westbound 172nd St NE just west of 11th Ave NE. We would like to find a way to upgrade the bus stop. The Gemmer development may provide a near term opportunity, but a future improvement (roundabout or signal) to the 11th Ave intersection may provide the best opportunity for a long term or more permanent bus stop improvement. Is it possible that the intersection at 11th could get upgraded soon?</p>	<p>Understood, but Bus Stops are not the obligation of Private Developer to build. It would be an impediment to traffic to put a bus stop into the approach of a future Roundabout and this project's frontage is not long enough to clear the RA approach.</p>
<p>In general, we prefer to have our bus stops far side of intersections, but on occasion, we serve near side bus stops. We do also have mid-block bus stops in our system, but with Lakewood HS on the south side of the street we would not want to create a situation mid-block where multiple students may try to hop off the bus and run directly across the street. With that in mind, could a bus stop be incorporated near side of 11th as part of the Gemmer development? One other thought, has the City considered possibly adding a mid-block ped crossing along the stretch of 172nd between 11th and the Shell Station?</p>	<p>The bus stop should be on the west side of the intersection and not in the approach to the roundabout. There will be a crosswalk at the entry on the west side of the service station. That would likely make a better location for a bus stop.</p>
<p>Snohomish County Public Works: Reviewer: Grupreet Dhaliwal, Engineer II</p>	
<p>It seems that the developer needs to revisit and resubmit the calculations. There are two options cited in the ILA to calculate the mitigation fee - it appears that the developer chose option one citing the Transportation Needs Report (TNR) but probably performed the calculations based on option 2. The option 1 uses PM Peak Hour Trips (PHT) whereas option 2 uses Average Daily Trips (ADT). For option 1, Exhibit 3 in ILA shows the steps to calculate mitigation fee, whereas Exhibit 2 helps calculating fee for option 1.</p>	<p>Brad Lincoln clarified issue with Grupreet.</p>

CITY COMMENTS	LAND TECH RESPONSE
<p>Stillaguamish Tribe: Reviewer: Kerry Lyste</p>	
<p>We would ask for notification of ground disturbance on this project for tribal monitoring.</p>	
<p>Public Works: Reviewer: Kim Bryant, Water Operations Supervisor Tim King, Utility Construction Lead II Ryan Keefe, Water Operations Lead II</p>	
<p>1. Meters not shown for lots 16, 38 and 53;</p>	<p>Water Meters have been added to Lot 16 and Lot 53.</p>
<p>2. Will irrigation meters be needed for green area Tracts? If so, need to provide irrigation meter and appropriate backflow prevention location;</p>	<p>Irrigation meters have been added to Tract areas.</p>
<p>3. Relocate hydrant assemblies to behind sidewalk;</p>	<p>All fire hydrants onsite have been moved to behind sidewalk.</p>
<p>4. Hydrant assemblies will needs a 5" Storz fitting and not the 4" currently called out on plans;</p>	<p>Hydrant assemblies call-out has been updated to 5" Storz fitting on plans.</p>
<p>5. Install Air Vac as necessary at high points in water main;</p>	<p>Need to check out high points and add air vacs as necessary.</p>
<p>6. No detail called out for water main and tie-in servicing lots 43 thru 46;</p>	<p>Callouts have been added on C33 Sewer Plan and Profile Road A north to the water main and tie-in.</p>
<p>7. Hydrant assembly detail not shown on plans;</p>	<p>Hydrant Installation detail has been added on C35 Sewer and Water Details</p>
<p>8. Size of water main along 11th Ave not called out as well as details of tie-ins at 172nd or into plat. No hydrant assemblies are shown along 11th Ave.</p>	<p>A fire hydrant has been added along 11th Ave. Need to review Fire Marshall's comments and add hydrants per those comments, he says three hydrants needed on 11th. One at each intersection.</p>
<p>Community Development: Reviewer: John Dorcas, Building Official</p>	
<p>3. <u>If any demolition work is purposed, and you are unsure if permit/s will be required for the removal of any existing structures.</u> Please contact the Building Division at 360-363-8100, to ask any specific questions.</p>	<p>Some light demolition will be needed and will get permits.</p>

CITY COMMENTS	LAND TECH RESPONSE
4. <u>Geotechnical report shall be required to be submitted and approved by the city for this project.</u>	Geotech Report provided.
Police Department: Reviewer: Dept. Brad Akau, Commander	
• The builder/developer to provide street lighting within the proposed development	Understood
• If lighting exists in the open spaces, it will be lower and maintained within the property lines.	Understood
• Addresses should be clearly visible from the street	Addresses to be clearly visible from street
• Shared securable mailboxes installed where residents can view activity around it from inside their residence	Mailbox Plan provided
• Shrubs should be no more than three (3) feet high (common areas are exempt)	Understood
• Lower branches on trees to be at least seven (7) feet off the ground for visibility (newly planted trees in common areas are exempt)	Understood.

Excerpt from Narrative on CPTED per Planner Review Comment #16.

CPTED: Crime Prevention through Environmental Design is required for Planned Residential Developments. Developments that are subject to Section 22C.010.290(5)(c) shall incorporate the following CPTED strategies into building design and site layout:

- (a) **Access Control:** having open access or multiple access points to a building/home increases potential for criminal intrusion. This is especially true if one or more of the access points are not observable by interested members in the community. For example, having two access points to a home with one being from an “Arterial” or road with a lot of drive-by traffic, traffic that has no real interest in the surveillance of the home, opens up a pathway for “criminals” to get into the homes unobserved. Having public access into the yard or home from one “end” of the home, especially if that access is from the side interior to the community and on a residential street, deters criminals from trying to enter a home. Members of a Community moving around on their community roads or sidewalks are more interested and observant of what is going on in “their” neighborhood. Those driving by on an arterial are thinking of getting to work or getting home.

The proposed layout offers public access to the homes from just one side, a side interior to the community where more interested observers will provide meaningful surveillance to the homes. The backyards will be fenced off or hedged off to any public access taking away

that “hidden” unobserved pathway for criminal access. This also provides a nice “private space” for the people living in this community.

The Active Recreation Space is intertwined throughout the community with many homes having this amenity out their backyard. These residents will also be able to observe and monitor what is going on in these spaces. Many elements of the open space are also placed on the community streets. The Passive Recreation area in the northwest corner of the community will be fenced to control access into the backyards of this portion of the community.

This Community proposal provides per the COM 22C.010.290 “...*Provisions of natural control limits access and increases natural surveillance to restrict criminal intrusion, especially into areas that are not readily observable.*”

- (b) Surveillance:** As with “Access Control”, access points to homes and recreational facilities need to be surveillable by interested observers. Primary access to homes should be from one side, and that side should be from the side where the most interested observers can view these entrances. That is having access from a *community side of the house* and not count on disinterested drivers on a high-volume road that is not an integral part of the community.

From the cities CPTED Guideline document “*Open Spaces and recreational areas should be located so that they can be observed from nearby homes.*” These are the homes of your neighbors and community that has a vested interest in keeping “their” community safe.

From COM Code “*Placement of features, uses, activities, and people to maximize visibility. Provision of natural surveillance helps to create environments where there is plenty of opportunity for people engaged in their normal behavior to observe the space around them.*” The people most engaged in having an interest in their neighbor’s homes and their parks are members of that community.

This Community proposal does have access to the homes from the interior of the Community and restricts access from outside with either fencing or hedging. As stated in the previous section, the Open Spaces and recreation areas are observable from nearby homes.

- (c) Territoriality/Ownership:** Having the Primary Entrance coming from the Community side of the home will “*encourage interaction between neighbors*”. Having a Primary Entrance out to High Volume Road not part of “your” community will not encourage this community interaction.

From COM Code it is important to provide “*Delineation of private space from semi-public and public spaces that creates a sense of ownership.*” Keeping the Primary Entrance to the Community side of the home allows for delineation of private space useful to the families that live in those homes. This as opposed to those homes that end up with an entrance at each end of the home with one coming from a “semi-public” side really removes any delineation of private space. Both useable ends of the homes end up accessible and unusable to as Private Space for families of the homeowner.

Techniques are incorporated that reduce the perception of areas as “ownerless” and, therefore, available for undesirable uses.

Examples of ways in which a proposal can comply with CPTED principles are outlined in the CPTED Guidelines for Project Design and Review, prepared by the city.