

First, we have read and contemplated all of your comments from the first submittal of the Orchard Hills Development. This review highlighted some deficiencies in both design and communications that we hope we have mitigated with this submittal.

It was at times difficult to make concise responses to comments because a good portion of them were "SEPA comments" but related to Twisp code and preliminary design. The purpose of the SEPA checklist is "to help determine whether the environmental impacts of your proposal are significant."

The SEPA has been updated with additional information that we have acquired since the original submittal but only within the scope of the SEPA process, for current design and compliance to codes please refer to the design drawings.

Some of the comments are confusing the issue at hand. The planned development proposal put forward by Palm Investments North is straight forward. Palm investments north will dedicate 40% of the lot to open space, keep building off the ridge line and limit the number of lots to 52 if the Town of Twisp agrees to allow smaller lot sizes and a limited number of zero lot line townhouses (not to exceed two residences per townhouse). Palm investment north is not proposing limitations in addition to the town's existing codes for residential construction be imposed on the future owners of lots within the development. In theory and in general, since this proposal is not exceeding the overall density allowed by R-1 zoning and the zoning process has already undergone the SEPA process the additional environmental impact is anticipated to be very small if residences are built in accordance with the Town of Twisp's codes and regulations. Additional mitigations should only be needed if there are environmental concerns that have not already been mitigated by the requirements of the codes and standards. It is Palm Investment North's opinion that if there are concerns about town wide items such as air quality that they should be addressed by modification to the code and apply to all citizens of Twisp equally. However, if the Town requests and has good justification for requiring additional construction limitations Palm Investments will entertain adding Plat and/or deed restriction to accommodate these requests.

There was a considerable overlap in the comments that were received, in fact they are surprisingly similar, so the 37 most frequent comments have been identified and responded to below instead of over and over again in the individual comment sheets.

Frequent Comment #1: The project density is too great and 53 lots is too many.

Response: The actual density of this project is less than the overall density allowed by R-1 zoning. Palm Investment North, LLC has spent a considerable effort in determining what the best lot layout would be to meet the project goals and a good balance in terms of density. The starting point for this calculation was the number of lots that would be allowed if a subdivision per the R1 zoning was executed. The parcel encompasses 16.81 acres or 732244sqft so if 18% is removed for infrastructure (the area of the road right of way as currently designed) that leaves 600440 sqft remaining for lots. Which equates to 60 ten thousand square foot lots. By proposing a planned development with only 52 lots there will be less residences in final build out than is allowed at this time by R-1 zoning and they will be concentrated on smaller lots that are below the ridge line and preserve a large portion of lot (40%) as public open space. Since this area is proposed to be dedicated to the town the citizens could work with the Town to utilize it in ways that are consistent with the Town's open space policy. Because it was important to Palm Investment North the open space was selected so that a route for hiking to

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the high point of the property was maintained. Additionally, the smaller lot sizes will be more affordable furthering the project goal of helping to provide affordable housing. The TMC states that minimum lot sizes do not apply to planned developments.

Frequent Comment #2: Storm water runoff is going to run off the site and negatively affect Painters Addition.

Response: The preliminary design of the storm water system has been completed in accordance with the Storm Water Management Manual for Eastern Washington. Like almost all jurisdictions in eastern Washington Twisp has adopted this manual as the basis for its storm water management standards because it defines the best management practices that are applicable. Onsite Infiltration is the preferred method of disposing of stormwater runoff and this site is especially well suited. Palm Investments North hired Aspect Consulting to analyze the soil and geomorphology to verify the feasibility of this approach. Their conclusion is that the soils are highly infiltrative and deep enough to support a storm water infiltration system more than adequate to meet the maximum design storm water flows. The report has been included in our resubmittal. What does this mean? It means that the storm water system for this development will collect, treat and infiltrate all of the storm water for a design storm frequency of 10yrs(Twisp standard) and any runoff in excess of this will be directed to the location it would have drained to prior to the development. There are comments alluding to an existing problem of seasonal water flow crossing the property at the south end and flowing into Painter's Addition. This project will not modify this area of the property and therefore will not solve or exacerbate the situation. Also, to be clear, each residence when built will collect treat and infiltrate their storm water as well.

Frequent Comment #3: The roads proposed are not adequate in width for safety and snow plowing.

Response: Twisp public works also had this concern. The ask for a variance from town standard has been dropped and the roads have been redesigned to meet Town of Twisp standards.

Frequent Comment #4: The proposed development does not meet the fire code requirement for two accesses for developments with over 30 residences.

Response: An alternate fire apparatus access road has been designed into the project that drops down to Issabella Lane to the North.

Frequent Comment #5: The submittal states that trails and pedestrian access are ideals that are aspired to but they seem to be inadequate and their should be a trail to town.

Response: Palm Investments North has no control of trail development off of their site. 5' paved side walks have been included adjacent to the roadways within the development and the open spaces is situated to allow for a hiking trails within them. It seems that a likely pattern of town walking access will develop, (contingent on adjacent land owners) that would include walking down the north fire access to Issabella Lane, continuing east across May Street and using the existing path down to the Twisp Community Center.

Frequent Comment #6: Minimum house size of 700sqft is too small.

Response: This request for variance has been dropped from the proposal.

Frequent Comment #7: Does the town of Twisp have the resources needed to maintain the new roads and open space dedicated to them in this proposal.

Response: Palm Investments North cannot speak directly to the resources that the town of Twisp has but in consulting with Twisp public works this has been one of their concerns. The current design has consolidated the road and utility system onto less road length while making them wider and easier to maintain. Further development of the open spaces has been removed from the project because it was indicated that it would be more appealing to not have the additional infrastructure to maintain at this time.

Frequent Comment #8: Pedestrian trails should take priority.

Response: 5' paved sidewalks have been included adjacent to the roadways within the development and the open space maintains the opportunity for hiking by accessing the ridge line off of Harrison and hiking north or accessing the open space off of Harrison to the south.

Frequent Comment #9: Energy source for heat should be limited and not include propane or wood.

Response: Palm Investments North in general agrees with these concerns but does not believe that restricting the emissions from heating equipment more than the requirements of the TMC would further the primary goal of providing affordable housing. The current requirements of the TMC are "All uses that produce emissions shall comply with the requirements of the Environmental Protection Agency and/or the Washington Department of Ecology."

Frequent Comment #10: The painters addition citizens have been hiking and recreating on this property and these recreational opportunities need to be maintained.

Response: First Palm Investments North would like to remind commentors that they do not have any right to enter the private property of others without their consent. However, a fundamental design parameter for this development was to layout the open space to accommodate public access to these opportunities. If the open space is acquired by the Town it will then become public property after which it is assumed that this access would be reserved into the future.

Frequent Comment #11: The project is proposed within critical areas (aquifer recharge, and steep slopes) as identified by the Town of Twisp that have not been addressed.

Response: The proposed project will have no negative impacts related to the critical areas criteria. The development will treat and infiltrate storm water as required by the town codes. All surface water, except in extreme storms, will be infiltrated and go towards recharging the aquifer. Steep slopes have been avoided within the developed lots and the Geotech report has not identified any areas of concern. The Geotech has cleared road cuts and graded slopes with 1:2 slopes as long as basic stabilization measures are implemented such as jute matts and hydroseeding. The specification of this

will be included in the final design. See the preliminary grading plan that has been included in the resubmittal for an idea of how this will be implemented.

Frequent Comment #12: This development is not low impact.

Response: By consolidating the improvements and infrastructure onto 60% of the property and limiting the residences to 52 instead of 60 this project has much less impact than the alternatives. Some impact is unavoidable and further impact reduction is not feasible due to the requirements of the Twisp public works and the applicable codes.

Frequent Comment #13: Soil map is not legible.

Response: This map should be legible in this submittal. Since the last submittal we have hired the services of a Geotechnical Engineer that has verified that the soils present on site are all conducive to the proposed development. See included geotechnical report.

Frequent Comment #14: How will the storm water be collected, treated and infiltrated.

Response: The storm water system for this development will collect, treat and infiltrate all of the storm water for a design storm frequency of 10yrs(Twisp standard) and any runoff in excess of this will be directed to the location it would have drained to prior to the development. Palm Investments North hired Aspect Consulting to analyze the soil and geomorphology to verify the feasibility of this approach. Their conclusion is that the soils are highly infiltrative and deep enough to support a storm water infiltration system more than adequate to meet the maximum design storm water flows. The report has been included in our resubmittal.

Frequent Comment #15: May and Harrison Street do not have enough capacity.

Response: Palm Investments North has hired SCJ to do a preliminary traffic study to determine the probable traffic that will result from the project. This report has been included in the resubmittal. They anticipated that both May and Harrison streets will see a peak hourly increase of 55 trips and an additional 563 daily trips. Although these are an increase in traffic flows, they do not represent an excessive traffic volume for the types of streets involved. The report has been made available to the Town and no request for additional information has been made.

Frequent Comment #16: Parking is not adequately addressed.

Response: Twisp code requires that each residence have 2 off street parking stalls per residence and Palm Investment is not requesting a variance from this. In addition, Twisp Public Works has requested that an 8' gravel parking strip be installed on both sides of the roads and this has been incorporated into the resubmittal.

Frequent Comment #17: The roads shown in the submittal are not compatible with snow removal.

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Response: Twisp Public works agreed with this comment and after meeting with them they requested the current street section that includes (2) 11 foot paved lanes and (2) 8 parking lanes which in their opinion gave ample room to clear snow.

Frequent Comment #18: There was historical Native American use of the property that would preclude it or part of it from development.

Response: The Methow Artifacts Research Project has no record of any artifact being found on the property and known locations of native American settlements were all along the Twisp and Methow rivers. Camping upon this property was unlikely due to the lack of a reliable water source. It is probable that many of the peoples on the surrounding areas hiked to the top of the property to enjoy the vista much as many of the residents of Twisp do today. The high points of the property are all proposed to be protected from further development.

Frequent Comment #19: How does the development make sure the houses will be affordable.

Response: Palm Investments North has been in direct communications with The Methow Housing Trust and, although an agreement has not been finalized, it is anticipated that they will be procuring 10 of the lots to construct housing upon. Additionally, the cost of smaller lots and the ability to build smaller houses should both hold the cost down. By adding to the inventory of buildable lots with in Twisp it should help to keep prices affordable.

Frequent Comment #20: Wood burning stoves should not be allowed.

Response: Palm Investments North in general agrees with these concerns but does not believe that restricting the emissions from heating equipment more than the requirements of the TMC would further the primary goal of providing affordable housing. The current requirements of the TMC are "All uses that produce emissions shall comply with the requirements of the Environmental Protection Agency and/or the Washington Department of Ecology."

Frequent Comment #21: Distance to the closest public transit.

Response: The closest public transit stop is the intersection of Glover St. and Twisp Ave which is approx. 2000 feet as the crow flies from the proposed development.

Frequent Comment #22: Not enough detail is given in relation to landscaping.

Response: The bulk of the landscaping will be up to the individual lot owners the same as the adjacent Painters Addition and the open space will be unmodified from its natural state. The property has water rights on the MVID ditch that will be available to land owners if their lots are within the area served by the ditch. The location of landscaping along the road right of way can be seen in the landscaping plan and at when building permits are obtained from the Town of Twisp for the building of structure, they will be required to meet the towns minimum standards. Additionally, please note that this is a single-family residential development and TMC 18.20.160 (2)(1) states" In no case shall landscaping regulations apply to single family residences."

Frequent Comment #23: The development will have a negative impact on aquifer recharge.

Response: By collecting and infiltrating all of the storm water up to the 10yr storm no perceivable negative impact to aquifer recharge will occur.

Frequent Comment #24: More detail is needed on what grading will be required on the site.

Response: In general, the design minimizes grading for road and utility installation. For further information on this see the preliminary grading plan included with the resubmittal.

Frequent Comment #25: Does the town of Twisp water and Sewer infrastructure have the capacity to service 53 new lots?

Response: Palm Investments North has been assured by Twisp public work that the water and sewer systems have the needed capacity for this development.

Frequent Comment #26: Are the streets included in the open space.

Response: As required by the Town of Twisp the area of streets and their associated right of ways are not included when calculating the open space.

Frequent Comment #27: Are the adjacent lots going to be developed.

Response: Palm Investments North has no control over whether adjacent lots are developed or not but the Town of Twisp development standards assume that eventually all lots will be developed. Palm Investments North owns no other properties in the vicinity of this development.

Frequent Comment #28: The property was an old orchard and should be tested for arsenic.

Response: This was a good recommendation and Palm Investment North has had the property tested for arsenic. Arsenic was found to be present but not primarily in the location of the old orchard and at depth that are not consistent with pesticide application. The arsenic found is highest in concentration the higher you go and closer to the rock outcropping and seems to be natural background arsenic. Palm Investments North will coordinate with the Department of Ecology on any mitigation required. The types of mitigation that is usually done is outlined the Department of Ecology's "Model Remedies for Former Orchards".

Frequent Comment #29: The total estimated impervious area stated as 30% is incorrect.

Response: This is the basis of the estimated impervious area. The current design has 1945 ft of roads with 22 ft width of paved lanes, 16 ft width gravel parking and 5 ft width of paved walkway which equate to 83635 sqft, 6180 sqft for fire apparatus access road, 14800 sqft for private access corridors, 300 sqft per lot allotment for parking and driveways (15,600 sqft total) and 1800 sqft per lot of structure (93,600sqft total) giving a total estimated impervious area of 213,815 sqft. The total sqft of the parcel being developed is 732,243 sqft. After dividing the total square footage into the estimated impervious area you get .292 or 29.2%.

Frequent Comment #30: Our kids play in the street and we wish them to be able to continue to do so.

Response: Palm Investment North would never recommend that kids play in any street. It would be much safer for these kids to play in the open spaces provided by this project.

Frequent Comment #31: May and Harrison Street should be improved as part of this project.

Response: Palm investment has hired the outside consultant SJC to approximate the additional traffic that will be the result of this project and evaluate the traffic impacts. The additional 563 trips per day are not anticipated to exceed the capacity of the existing roads and trigger road improvements.

Frequent Comment #32: The development will cause slope instability and erosion.

Response: Palm Investment North's geotechnical consultant Aspect Consulting has determined that slopes 1:2 rise to run can be easily stabilize with hydro seeding and jute mats with the soil types that are found on the site. The preliminary grading plan has been developed with this as a design constraint. The Geotech report has been included in this resubmittal.

Frequent Comment #33: The development will make the seasonal flooding of Painters addition worse.

Response: As described by the commentors there is a problem with water crossing the area of the development proposed as open space at the south end. This area of the development is the natural drainage path for water that originates offsite. This drainage path will not be modified and therefore will not solve or exacerbate the situation.

Frequent Comment #34: May Street is a dead-end street and in the case of wild fire will restrict the ability to quickly evacuate all people. Palm Investments North needs to provide a second access.

Response: The Town is aware of this situation and has for many years been trying to provide a solution that is feasible both in terms of right of way and financing. The town and Palm Investments spent a considerable amount of time and effort trying to work together to find a feasible alternate access to May Street and Palm investments was willing to assist in the construction of this access. However, as most of Painter's Addition residents are probably aware, just finding a feasible route is extremely difficult. To make a long story short the Town of Twisp agreed that the burden of an alternate access shouldn't be the responsibility of Palm Investments North and this should not be a limiting factor for the planned development. The Town has pledged to keep trying to find a solution to this issue and Palm Investments North agreed to assist as much as possible. The development as a whole should reduce the overall wild fire risk to Painter Addition by providing a buffer of fire hydrants and irrigation sources to the West.

Frequent Comment #35: Lights in the development will cause glare and light pollution and need special controls in addition those in the Twisp Municipal Code.

Response: Palm Investments North does not believe this to be the case primarily because when looking up from Twisp proper the houses in Painter's Addition will be in the line of site of most of the

houses that will be constructed within the development. The Painter Addition houses have no additional lighting constraints and to our knowledge there has been no glare or light pollution complaints directed toward them. Additionally, TMC has requirements related to glare in the general provisions that must be met before issuance of a residential building permits.

Frequent Comment #36: The area with seasonal flows is also a wetland and setbacks apply.

Response: Palm investments North hired an outside environmental consultant, Grette and Associates, LLC, to determine if any wetlands were present on the site and delineate them if they were present.

No wetlands were found. Grette and Associates' report has been attached to the resubmittal.

Frequent Comment #37: How will dust be controlled during construction.

Response: The Department of Ecology publication "Methods for Dust Control" 2016 will be utilized to prepare a dust control plan in accordance with the town of Twisp's codes and regulations. This will be finalized prior to the final permit application.

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