

September 14, 2022

RE: Halara Hills (S2022-102 & EA2022-115)

Dear Mr. Hearing Examiner:

I was previously scheduled to be out of town at the time of the public meeting. I am concerned that my internet reception may not be adequate to make an oral comment at the hearing and therefore wish to submit the following comment.

After reviewing the Staff Report, two things are absolutely clear: (1) a SEVA is required; and (2) the developer does not have a SEVA. The Fire Marshall has recommended a denial of this application on the lack of SEVA and feels that allowing a condition for later approval by city officials would be inappropriate as the issue was raised in the last application.

I agree with the Fire Marshall and request a denial of this application. Please do not approve this application with the condition of future approval of the SEVA. This would effectively cut out the public from this important issue. The public has demonstrated in the last application and in the current application that we are very active and concerned in this matter. A SEVA is a safety issue that directly affects the neighborhood. The new development would burden our local streets and could cause harm to the public in an emergency. For these reasons, the public should be allowed to fully participate and comment on the details of the SEVA.

The City has also recommended that the Hearing Examiner task the developer with provided safe pedestrian walkways from the proposed development to Keene Road. There are no sidewalks along Country Ridge Drive. However, no definitive condition is put in place for this. Again, this is another safety issue that was addressed during the last application that was denied that has again gone unanswered.

There was some speculation that on Exhibit 13, there may be a location for a safe walking path and SEVA. Exhibit 13 was not included in the Staff Report and therefore not made available to the public. Hopefully, the long windy path next to an open canal is not being contemplated as a safe pedestrian walkway for children or as a suitable road for emergency vehicles.

Again, the city has not addressed that the proposed development would exceed traffic usage along the local streets of Strawberry Lane and Country Ridge Drive. The traffic light addresses only the intersection. No development should be approved at the proposed location until the deficient traffic situation is remedied.

Further, the city noted that a six-foot high masonry wall should be constructed on the side of the development boundary shared with the existing neighborhood to provide buffer for assumedly privacy, noise, and dust prevention. The developer had recommended a 15-foot boundary with trees as a buffer. As a property owner adjoining to the proposed development, I would like to note that the property dives down at the property boundary. Constructing a masonry wall at the boundary line against my fence would not provide the intended mitigation. The wall would need to be set back at least 15 feet at the more elevated location and then the 15-feet or so of land at the property edge should have evergreen trees (the wind blows sharply from the proposed site over the existing neighborhood) up to the wall.

It feels premature to discuss these mitigation matters, although important, because the very important safety and traffic issues raised in the last application have still not been addressed by the developer.

I respectfully urge you to again deny this application. The developer can submit a new application once it has a SEVA in hand and has a suitable solution to the safe walking path and traffic issues.

Respectfully,

Chad Hatfield - 1133 Stallion Place, Richland, WA 99352

Comments to Hearing Examiner on S2022-102 & EA2022-115 Halara Hills

Laurie Ness
Patrick Paulson

The Staff Report states that the requirements of RMC 22.10.200 have been met, as well the other requirements of Richland's Critical Area Ordinance (CAO) and State Environmental Policy Act (SEPA) regulations.¹ But as we argued in our comments,² the proposed action fails to meet requirements both under SEPA and the CAO.

The planning staff is due a degree of deference in the interpretation and implementation of development regulations. However, we would like the Examiner to note that many provisions protecting wildlife habitat as critical areas have only recently been added to the CAO. When interpreting and implementing these provisions, the City does not have the kind of experience, standing policy, and existing procedures that exist for other development regulations. The City's current interpretation and implementation of these provisions is resulting in irreversible destruction of wildlife habitat in Richland, contrary to the intent of the Richland CAO and the requirements of the Growth Management Act (GMA).

Requirements for the habitat assessment report (RMC 22.10.200) were adopted by the City in October 2017;³ there was no habitat reporting requirement before that time. These requirements – as well other provisions protecting wildlife habitat as critical areas – were added to the CAO largely due to the efforts of Laurie Ness, who commented extensively during the 2017 review of Richland's CAO. This review was required by the GMA.

Richland has designated Shrubsteppe as a critical area only since 2018, and then only because of a ruling by the Eastern Washington Growth Management Hearings Board.⁴ The ruling

¹ City of Richland, 2022. *S2022-102 Halara Hills Staff Report*. p. 20. In Staff Report packet pp. 1-31. <https://www.ci.richland.wa.us/home/showpublisheddocument/13909>.

² Laurie Ness and Patrick Paulson, 2022. *Comments on S2022-102 & EA2022-115 Halara Hills*. In Exhibit 10 of Staff Report Packet at pp. 549-575 of packet.

³ With adoption of ordinance 40-17.

⁴ Growth Management Hearings Board, Eastern Washington Region. 2018. *Case No. 17-1-0006, Final Decision and Order*.

requires Richland to designate shrubsteppe – and other Priority Habitats and Species (PHS) recognized by the Washington Department of Fish and Wildlife (WDFW)—as a Fish and Wildlife Habitat Critical Area (FWHCA). Before this time Richland’s CAO had no requirement to consider WDFW’s management recommendations for PHS.

Because of the recent adoption of the CAO provisions protecting shrubsteppe and other PHS – and because of the magnitude of these changes – we urge the Hearing Examiner to hold both city staff and developers to the letter and spirit of the CAO and to the intent of the Richland City Council and the GMA.

Stevens, Mike

From: RAJIV MALHAN <RAJIVMALHAN@msn.com>
Sent: Wednesday, September 7, 2022 10:48 PM
To: Stevens, Mike
Subject: Comments regarding new subdivision above Country Ridge/Small lots

To whom it may concern,

This letter is inform you that we are extremely disappointed and concerned with your continuing efforts to put higher traffic through our streets on Country Ridge Dr., We live at 1231 Country Ridge Dr. and have had to deal with high speed traffic, unsafe driving where my mail box was wiped out three different times in last 10 years, my basement has been flooded three times due to heavy rain .This has been due directly because of poor planning by the new subdivision put above our neighborhood. The storm drain in existence cannot handle the rain water overflow on our street. By adding another subdivision you will be further adding problems on top of the existing ones. There is already too much traffic, and we fear that putting another subdivision will not be sustainable.

Rajiv and Monica Malhan

Stevens, Mike

From: Rakesh Malhan <rakeshmalhan@gmail.com>
Sent: Friday, September 9, 2022 3:08 PM
To: Stevens, Mike; Rakesh Malhan
Subject: Halara Hills - S2022-102 & EA2022-115

Please provide this email below to the hearing examiner. Thank you.

My name is Rakesh Malhan. I live next to this newly proposed development, "Halara Hills". I've lived in Richland for over 40+ years. I've attended Hanford Middle School and Hanford High School. I've been a builder / developer from last 25+ years in Richland. We had similarly expressed our concern when this same land was proposed under a different name, "Ladera".

I had considered developing this same land behind our subdivision a few years ago. I spoke with the Planning Department with the City of Richland. Planning Department had told me that city will not allow any connection through Strawberry Lane via Country Ridge area. Traffic through Country Ridge development area has reached its maximum capacity. Only way to get an approval was to punch a road through Dallas Rd. Also, the best they would be able to approve would be a low-density residential development if all the other conditions are met. Based on the cost associated with punching a new road and development cost, I had to let go of this investment opportunity. I don't understand why City of Richland would not allow a local developer who has been involved in development and community encashments for years but yet allows an out of state developer for the exact same project thus giving them this opportunity. I would like to know why City of Richland denied few of the minority race developers in the past for this project who proposed a low-density residential development with much lower traffic. These proposed developments would carry on the same type of housing as the other connecting development (i.e., Country Ridge, Country Heights, Country Estates, etc). City has deprived me of an investment opportunity along with the other local minority race investors / developers. I would like to hope that this is not the case, but the perception speaks otherwise. The hearing examiner asked for developers to submit information about their pre-development meetings or applications with the city in the past. I sent an email with the details, but it was not forwarded to the hearing examiner. I called the planning department to ask that my email be included and was told that the hearing examiner is not concerned with that information. This was very troubling to me because I heard the Hearing Examiner request this information at the hearing.

Those same traffic issues exist now if not worst when we proposed to develop this land. At the last hearing, the hearing examiner rejected the proposed site without Secondary emergency vehicle access (SEVA) which was identified as a major issue and a primary reason that the last application was denied. This application is asking for the hearing examiner to allow the developer to work out critical issues regarding safety and traffic with the city at a later time. It's unfortunate to have to say this, but we cannot rely on working out issues on a later date when they are not able to resolve these today. This is a real safety issue, and it needs to be resolved prior to this development being approved. We need assurance that the city has public's best interests and promote our safety not looking at the profits from all the permits and fees. Through the course of these two application processes, we understand that we need to respectfully urge the hearing examiner to rule on each important issue and not leave it in the hands of city officials and developers to resolve later. There have been years to propose a SEVA and they have not come up with a solution, which indicates there is not a good solution.

Looks like City of Richland no longer concern themselves with the safety of the residence. City is strictly focusing on the revenue generated by this development or possibly other revenue from the developer. Country Ridge development is built as a country setting with larger lots therefore these minor streets are not designed for this vastly increased traffic.

Also, city had given me the assurance that there would be no increased traffic allowed through Strawberry Lane. This is one of the reasons why I chose the location for my personal house and invested this much money, so my family is safe in our own neighborhood, my property value is protected, and my view is not disrupted. There appears to be a lot of discrepancies and biases in City of Richland policies.

Rakesh Malhan, CHO, PMP

Email: rakeshmalhn@gmail.com

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Stevens, Mike

From: Roger and Judy Williams <rajjwilliams@frontier.com>
Sent: Thursday, September 8, 2022 9:12 AM
To: Stevens, Mike
Subject: Country Ridege

Dear City Hearing Examiner

As a resident and homeowner in Country Ridge, we object to the "Lahara Hills" developer's proposed project. We respectfully urge you to rule on each important issue Country Ridge residents have raised concerning safety & traffic in our area and not leave it in the hands of city officials. Through the course of two application processes, it has become clear we cannot rely on our city officials to promote or pursue the safety interests of our public.

Thank you very kindly, for giving our stated concerns your serious consideration going forward in this matter.

Respectfully yours,

The Williams Family
2619 Horseshoe Court

Stevens, Mike

From: Jessica Lally <Jessica_Lally@Yakama.com>
Sent: Friday, September 9, 2022 2:54 PM
To: DAHP SEPA (DAHP); Stevens, Mike
Cc: Casey Barney; Corrine Camuso; Gregg Kiona; Noah Oliver
Subject: Re: S2022-102 & EA2022-115 Preliminary Plat of Halara Hills

Hi Mike,

Yakama Nation CRP concurs with with DAHP's recommendation for survey.

Jessica Lally
Yakama Nation Archaeologist
Cultural Resources Program
509-865-5121 x4766

From: DAHP SEPA (DAHP) <sepa@dahp.wa.gov>
Sent: Thursday, September 1, 2022 12:26 PM
To: Stevens, Mike
Cc: Ashley Morton; Carey Miller (CareyMiller@ctuir.org); Christian.Nauer@ctwsbnr.org; Casey Barney; Corrine Camuso; Gregg Kiona; Jessica Lally; Kate Valdez; Noah Oliver
Subject: RE: S2022-102 & EA2022-115 Preliminary Plat of Halara Hills

Hi Mike,

Is this project going to be essentially identical to the Ladera project (i.e. same footprint)? If so, my original recommendation for an archaeological survey still stands. Please see the attached letter.

All the best,

Sydney Hanson, MA (she/her) | **Local Government Archaeologist**
Eastern Washington & Columbia River Counties
360.280.7563 | sydney.hanson@dahp.wa.gov

Department of Archaeology & Historic Preservation | www.dahp.wa.gov
1110 Capitol Way S, Suite 30 | Olympia WA 98501
PO Box 48343 | Olympia WA 98504-8343

 Please consider the environment before printing this email

From: Stevens, Mike <mstevens@CI.RICHLAND.WA.US>
Sent: Thursday, August 18, 2022 3:29 PM
To: Acevedo, Mizaël <macevedo@CI.RICHLAND.WA.US>; Ashley Garza <agarza3605@gmail.com>; Ashley Morton <AshleyMorton@ctuir.org>; Badger Mountain Irrigation District <bmidmanager@badgermountainirrigation.com>; Benton PUD, Broadband <osp@noanet.net>; Benton PUD, Electrical <engservice@bentonpud.org>; Bill Barlow

<bbarlow@bft.org>; Buechler, Ken <KBuechler@CI.RICHLAND.WA.US>; Carrie Thompson <carrie.thompson@bnsf.com>; Casey Barney, Yakama Nation <Casey_Barney@Yakama.com>; Catherine Dickson <catherinedickson@ctuir.org>; Clark Posey <clark.posey@co.benton.wa.us>; Corrine Camuso, Yakama Nation <Corrine_Camuso@Yakama.com>; Hamilton, Craig <C.Hamilton@bces.wa.gov>; DAHP SEPA (DAHP) <sepa@dahp.wa.gov>; DAlessandro, Carlo <cdalessandro@CI.RICHLAND.WA.US>; Damrell, Kevin <kdamrell@CI.RICHLAND.WA.US>; Darrick Dietrich <darrick@basindisposal.com>; Davis, Deanna <d.davis@bces.wa.gov>; Deborah Rodgers <dxrogers@bpa.gov>; Deskins, John <jdeskins@CI.RICHLAND.WA.US>; Doan, Charles <cdoan@CI.RICHLAND.WA.US>; Eric Mendenhall <emendenhall@westrichland.org>; ECY RE Former Orchards <formerorchards@ECY.WA.GOV>; gis@co.benton.wa.us; Greg Wendt <greg.wendt@co.benton.wa.us>; Clear, Gwen (ECY) <GCLE461@ECY.WA.GOV>; Hill, Kelly <khill@CI.RICHLAND.WA.US>; Jason McShane <jmcshane@kid.org>; Jessica Lally, Yakama Nation <Jessica_Lally@Yakama.com>; John Lyle <john.lyle@bentoncleanair.org>; Jordon, Joshua <jojordon@CI.RICHLAND.WA.US>; Joseph Cottrell <jecottrell@bpa.gov>; Junior Campos <junior.campos@charter.com>; Katherine Cichy <katherine.cichy@ziply.com>; Cooper, Kelly (DOH) <Kelly.Cooper@DOH.WA.GOV>; Kevin Knodel <kevin.knodel@rsd.edu>; Kevin Sliger <KSliger@bft.org>; KID Development <development@kid.org>; KID Webmaster <webmaster@kid.org>; M. Deklyne <mjddeklyne@bpa.gov>; Map BCES <map@bces.wa.gov>; Mattheus, Pamela <pmattheus@CI.RICHLAND.WA.US>; Michael Tovey <michael.tovey@ziply.com>; Noah Lee <noah.lee@bentoncleanair.org>; Noah Oliver, Yakama Nation <Noah_Oliver@Yakama.com>; Gonseth, Paul <GonsetP@wsdot.wa.gov>; ReathaFord, Jason <JReathaFord@CI.RICHLAND.WA.US>; COM GMU Review Team <reviewteam@commerce.wa.gov>; Richard Krasner <richard.krasner@rsd.edu>; USPS Richland Postmaster <99352RichlandWA-Postmaster@usps.gov>; Dawson, Rick (DOHi) <rickd@bfhd.wa.gov>; Robin Priddy <robin.priddy@bentoncleanair.org>; Sarah Gates <s.gates@bces.wa.gov>; Schiessl, Joe <JSchiessl@CI.RICHLAND.WA.US>; DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>; ECY RE SEPA REGISTER <separegister@ecy.wa.gov>; ECY RE SEPA REGISTER <separegister@ecy.wa.gov>; Seth DeFoe <SDefoe@kid.org>; South Central Region Planning <scplanning@wsdot.wa.gov>; Platts, Max <PlattsT@WSDOT.WA.GOV>; Tyutyunnik, Ruvim <rtutyunnik@CI.RICHLAND.WA.US>; WA Dept of Fish & Wildlife <lopezlal@dfw.wa.gov>; Ritter, Michael W (DFW) <Michael.Ritter@dfw.wa.gov>; DFW R3planning <R3planning@dfw.wa.gov>; Westphal, Nichole <nwestphal@ci.richland.wa.us>; Whittier, John <jwhittier@CI.RICHLAND.WA.US>; Simpson, William (COM) <william.simpson@commerce.wa.gov>

Subject: S2022-102 & EA2022-115 Preliminary Plat of Halara Hills

External Email

Attention!

The City of Richland has received an application for the Preliminary Plat of Halara Hills (previously referred to as the Preliminary Plat of Ladera). Due to the size of the application packet I am unable to attach the application packet to this email. However, the link below will direct you to the City's website where you will be able to review the application materials. Please review and submit any comments you may have back to me by 5:00 PM, Wednesday, September 7, 2022.

The City of Richland is lead agency for the proposal under the State Environmental Policy Act (SEPA) and has reviewed the proposed project for probable adverse environmental impacts and expects to issue a determination of non-significance (DNS) for this project. The optional DNS process in WAC 197-11-355 is being used. This may be your only opportunity to comment on the environmental impacts of the proposed development.

LINK: [Halara Hills](#)



Mike Stevens

Planning Manager

625 Swift Blvd., MS-35 | Richland, WA 99352

(509) 942-7596

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Stevens, Mike

From: Buechler, Ken
Sent: Monday, September 12, 2022 12:20 PM
To: Nathan Machiela
Cc: VanBeek, Michael; Jordon, Joshua; Huntington, Thomas; Stevens, Mike
Subject: RE: Halara Hills

Nathan,

Since the SEVA was one of the major hang-ups that stopped the Ladara proposal, the Fire Marshal's Office feels it is in everyone's best interest to work through the SEVA requirements during the Preliminary Plat process. That is the intent of the preliminary process. Kicking the can down the road could more than likely end with the same results at the Larada project. If so, it would be a waste of time, effort and money for the Hearings Examiner, Pahlisch, Economic Development and the Fire Marshal's Office.

As you insinuated in your e-mail, the Fire Marshal's Office will follow whatever avenue the Hearings Examiner decides, but waiting until we are at Final Plat will not waiver our requirement to follow the code. We will not be pressured at a later point into anything less-than full code compliance. The Richland Fire Marshal's Office has already obtained third-party consultation on our interpretation of the SEVA code requirements as presented for the Ladara project. The Halara project does not appear to differ from those requirements, nor does it provide any insight into a solution.

We look forward to working with Pahlisch to find a successful code compliant path forward, but waiting does not increase the odds of success.

The last informal and verbal proposal that was presented to our office, was to use the irrigation ditch in one form or another. Pahlisch representatives verbally stated that they had the irrigation district's approval to use the ditch bank as a SEVA and that they would pave the SEVA along its entire length. They also stated that the irrigation district would require the City of Richland to sign a "Hold Harmless Agreement" for the use of the ditch bank as a SEVA. I mentioned at that time, Pahlisch would need to submit everything in writing before any agreement could be considered. I also mentioned that I could foresee the City Attorney not willing to take on all the risk and liability of a Hold Harmless Agreement with the Irrigation District for the sole benefit Pahlisch. To date, we have not seen the Irrigation District Agreement, a Hold Harmless Agreement or a submitted plan set showing how the full SEVA would look.

Nothing further was ever discussed or submitted past that initial conversation to my knowledge.

Mike Stevens,
Can you save or submit this for record.



Kenneth L Buechler
Fire Marshal
625 Swift Blvd., MS-16 | Richland, WA 99352
(509) 942-7556
(509) 578-9321

From: Nathan Machiela <nathan@knutzenengineering.com>
Sent: Monday, September 12, 2022 11:06 AM
To: Buechler, Ken <KBuechler@CI.RICHLAND.WA.US>
Subject: FW: Halara Hills

Ken, this is the legal council response for Pahlisch Halara Hills. We definitely want you on board prior to the hearing so would like to move you to the "agree" column, how set are you on the stance that you need to have the SEVA established prior to the hearing? The Pahlisch attorney will probably state that there is not a legal basis for the requirement to establish the SEVA prior to the PP approval.

I know this legal stuff is outside your standard operating procedure but wanted you to know how they will address this item.

Let me know your thoughts.

Thanks,

Nathan Machiela, P.E.
Principal Engineer – Vice President
O: 509.222.0959
C: 509.579.1887



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From: Mike Robinson <miker@pahlisch.com>
Sent: Monday, September 12, 2022 10:57 AM
To: Nathan Machiela <nathan@knutzenengineering.com>; Joey Shearer <shearerj@aks-eng.com>; Jerry Jones <Jerryj@pahlisch.com>; Michael Andreotti <andreottim@aks-eng.com>; Ana Bozich <anab@pahlisch.com>; Jeff Vanderdasson, PE <Jeffv@pahlisch.com>
Cc: Stacey Reed <StaceyR@aks-eng.com>; Joe Bessman <joe@transightconsulting.com>; Mike Robinson <miker@pahlisch.com>
Subject: RE: Halara Hills

Thanks, Nathan, for the follow-up.

That position is inconsistent with the Hearings Examiner's prior decision on this topic and I don't think there's anything in the relevant standards that requires this timing.

Mike Robinson

Director of Government and Legal Affairs

From: Nathan Machiela <nathan@knutzenengineering.com>

Sent: Monday, September 12, 2022 9:50 AM

To: Joey Shearer <shearerj@aks-eng.com>; Mike Robinson <miker@pahlisch.com>; Jerry Jones <Jerryj@pahlisch.com>; Michael Andreotti <andreottim@aks-eng.com>; Ana Bozich <anab@pahlisch.com>; Jeff Vanderdasson, PE <JeffV@pahlisch.com>

Cc: Stacey Reed <StaceyR@aks-eng.com>; Joe Bessman <joe@transightconsulting.com>

Subject: RE: Halara Hills

I talked with Ken Buechler and he said the SEVA must be established with the preliminary plat and he wants to get the location and agreements approved prior to the hearing.

Thanks,

Nathan Machiela, P.E.
Principal Engineer – Vice President
O: 509.222.0959
C: 509.579.1887



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From: Joey Shearer <shearerj@aks-eng.com>

Sent: Friday, September 9, 2022 4:56 PM

To: Mike Robinson <miker@pahlisch.com>; Jerry Jones <Jerryj@pahlisch.com>; Michael Andreotti <andreottim@aks-eng.com>; Ana Bozich <anab@pahlisch.com>; Jeff Vanderdasson, PE <JeffV@pahlisch.com>

Cc: Nathan Machiela <nathan@knutzenengineering.com>; Stacey Reed <StaceyR@aks-eng.com>; Joe Bessman <joe@transightconsulting.com> <joe@transightconsulting.com>

Subject: RE: Halara Hills

I think the staff report mischaracterizes the SEVA as justification for the previous denial. From the HE's decision:

12. So, ample evidence in the record shows that, while this application cannot be approved as designed, any future application for development on the same site with more than 16 homes would most likely be required to include a Secondary Emergency Vehicle Access (SEVA) route meeting Fire and Public Works standards for such roads. And, consistent with other plats approved in recent years, a permanent SEVA must be paved with 2-inches of asphalt over 4-inches of gravel, at a minimum. The applicant is correct in stating that the final location of any SEVA route can be addressed after preliminary plat approval and imposed as a requirement that must be satisfied before final plat approval.

Nathan – Would sprinkling the homes remove the SEVA requirement?

Thanks,

Joey Shearer, AICP – Principal

AKS ENGINEERING & FORESTRY, LLC

P: 541.317.8429 Ext. 514 | www.aks-eng.com | shearerj@aks-eng.com

From: Mike Robinson <miker@pahlisch.com>

Sent: Friday, September 9, 2022 12:37 PM

To: Jerry Jones <Jerryj@pahlisch.com>; Joey Shearer <shearerj@aks-eng.com>; Michael Andreotti <andreottim@aks-eng.com>; Ana Bozich <anab@pahlisch.com>; Jeff Vanderdasson, PE <JeffV@pahlisch.com>

Cc: Nathan Machiela <nathan@knutzenengineering.com>; Stacey Reed <StaceyR@aks-eng.com>; Mike Robinson <miker@pahlisch.com>

Subject: RE: Halara Hills

EXTERNAL EMAIL: This email originated from outside AKS Engineering & Forestry.

Here's a summary of the packet's references to SEVA(excluding the application narrative):

1. Staff Report explains the reasons for the denial of the first application(PDF page 4; #2 is SEVA).
2. Staff Report discusses SEVA issue(PDF pages 10-12; notes the Fire Marshall commented that the applicant has not established an acceptable SEVA route; mentions conditions 54 and 62 but there's no condition 62; I think he meant conditions 54 and 55(Pdf pages 30).
3. Finding 13 regarding SEVA(PDF page 19; conclusory and not supported by substantial evidence).
4. Condition 13(PDF page 20; establishes improvement requirements for SEVA route).
5. Condition 54(PDF page 30; requires evidence of SEVA easement prior to or concurrent with firsts et of construction drawings and **shall** be approved by the Fire Marshall).
6. Condition 55(PDF page 30; requires Fire Marshall approval of SEVA).
7. Public Comments: SEVA is mentioned 84 times in the public comments.

Mike Robinson

Director of Government and Legal Affairs

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