

**From:** [Sears, Tricia \(DNR\)](#)  
**To:** [Chris Pasinetti](#)  
**Cc:** [Sears, Tricia \(DNR\)](#); [Pate, Nathan \(COM\)](#)  
**Subject:** Enumclaw's 2024 Comprehensive Plan Periodic Review and Development Regulations update (Commerce ID# 2024-S-7309).  
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8/5/24

Hello Chris,

In keeping with the interagency correspondence principles, I am providing you with comments on Enumclaw's 2024 Comprehensive Plan Periodic Review and Development Regulations update (Commerce ID# 2024-S-7309).

For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining, climate change, and natural hazards mitigation plans.

Specifically in this proposal, I reviewed the document, Chapter 19.02 CAO Update.

19.02.070 Geologically Hazardous Areas

B. Identification.

"In the case of geologic hazards, the qualified professional is a registered engineering geologist or a licensed geotechnical engineer" Suggest adding licensed in Washington.

"Those areas mapped as quaternary slumps, earthflows, mudflows, lahars, or landslides on maps published by the U.S. Geological Survey or Department of Natural Resources Division of Geology and Earth Resources;" Suggest using the current name of Department of Natural Resources Washington Geological Survey instead of Department of Natural Resources Division of Geology and Earth Resources.

"f. Technical Information.

i. Identify and quantify geologic, topographic and hydrologic factors that might contribute to slope instability. The rate and extent of potential hazards to development activity must be assessed and mitigation measures, if any, evaluated. The proposed development must be analyzed in light of the hazards and effects represented by the landslide exposure on proposed private and public investments.

Development operational factors should be included in the analysis to account for the effects of residential landscape irrigation, storm water generation from impervious surfaces and the influence of street conveyance on slope stability.

ii. The submittal of a geotechnical report establishing the suitability of the site for construction shall be required.

iii. If found to be suitable, a professional registered engineer shall design a foundation that accommodates on-site conditions.”

This section is vague. Suggest rewriting this section to provide more detail about your process of review and the information to be submitted. For example, what would make the site suitable for construction? Do you require a report that includes both written narrative and a site map? Have you considered requiring the geologically hazardous areas and any other critical areas to be physically marked on the site temporarily or permanently? Have you considered requiring the property owner to record to title that they are in a geologically hazardous area and any other critical area? There are many jurisdictions with code provisions you could review as examples of codes with more detailed provisions. Think about what information you would like to have provided to you to make more informed decisions. Upon further reading of the document, I see the sections on standards and other details. Suggest putting a reference to these sections in the earlier sections of code so the reader knows they should go read the other sections for the necessary details that are not provided.

“3. Seismic Hazard Areas – Technical Information” This section is vague. Suggest adding a description of seismic hazard areas and a reference to maps that may be used.

#### 19.02.020 Critical Areas Maps and Databases

The language indicates there are maps in the comprehensive plan, but there are also inventory maps and a database. Suggest adding language that is more specific information. Even something simple like, these maps and databases are kept current and located at the Planning and Zoning office, or whatever.

#### 19.02.140 Application

Critical areas report is submitted and the geotechnical report is in addition to it.

Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:

- Consider adding a reference to WAC 365-190-120 geologically hazardous areas for definitions in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands.
- Consider adding a reference to the WGS Geologic Information Portal in other areas besides the CAO. If you have not checked our interactive database, the WGS Geologic Information Portal, lately, you may wish to do so. [Geologic Information Portal | WA - DNR](#)
- If you have not checked out our Geologic Planning page, you may wish to do so. [Geologic](#)

[Planning | WA - DNR](#)

Thank you for considering our comments. If you have any questions or need additional information, please contact me. For your convenience, if there are no concerns or follow-up discussion, you may consider these comments to be final as of the 60-day comment deadline of 9/30/24.

Cheerio,  
Tricia

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