



50 PARK OF COMMERCE WAY
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May 30, 2023

Dan Frazier
Town of Bluffton
20 Bridge Street
Bluffton, SC 29910

Re: Wetland Impact Plans of Parcels 12A, 12B,
and 12C
DP-03-23-017841
Bluffton, South Carolina
J-25312.0015
Comment Response Letter

Dear Mr. Frazier:

On behalf of our client, Jake Reed of University Investments, LLC, regarding comments dated May 12, 2023 for the Wetland Impact Plans of Parcels 12A, 12B, and 12C, we offer the responses (in bold italics) found below.

Also, please find closed the following information in support of our resubmittal for approval and for being on the agenda for the Planning Commission meeting in June 2023:

- Updated Site Development Plans
- Compliance Calculator
- Wetland Impact Permit #2003-1G-006
- Cultural Resources Overview
- Soils Map

Planning Commission Review – Revisions Required

1. This development plan application is not associated with an approved master plan, however, it is recognized that per Section 2.D.19 of the Buckwalter Planned Unit Development infrastructure serving the community (on-site and off-site) is exempt from the Initial Master Plan approval process. The stated intent of the proposed development is to provide fill wetland crossings to allow for future road alignments in compliance with the approved Bluffton Parkway Access Management Plan.
Response: Acknowledged.
2. The proposed project includes land disturbance on Town owned property (Innovation Drive R/W). Provide a Property Owner Letter from the Town authorizing the applicant to proceed with the development plan application on Town property.

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Response: Our client has reached out to Stephen Steese for an encroachment request. We received an email on May 24, 2023 communicating that the Town of Bluffton has met and discussed the request and is setting up language for an encroachment permit.

3. RECOMMENDATION: As previously discussed, it is recommended that the Innovation Drive right-of-way be used as the haul road for the proposed work to minimize land disturbance. The result will be less trees removed, less impervious area created and less overall disturbance of land. This aligns with the stated intent of the request included in the application narrative, which is to "limit proposed disturbance at the site to the minimal amount required to transport and place the fill in desired areas".

Response: Thank you for the recommendation, but the applicant would prefer to keep the access as shown on the site plans. Creating an access within the Innovation Drive right-of-way would be highly visible to the public, especially to people coming in and out of Buckwalter Place. This could increase the likelihood of people traveling into this area out of curiosity.

In addition, development for a separate project is already planned at the access shown on the plans. Sharing this access allows construction activity to occur at one point off Bluffton Parkway instead of two separate points, thus reducing traffic interruptions.

Planning Review – SR – Revisions Required

1. Per the Buckwalter Development Agreement and Concept Plan, a 25' buffer is required along the southern property line. No grading or clearing shall occur within the 25' buffer. Revise plans to accommodate the buffer requirement.

Response: Revised. Per a "Correction to DRC Comments" email from the Town of Bluffton on May 16, 2023, a 50' buffer was added to the site plan sheets. The dry basins were revised accordingly. Please see sheets C2.1-C2.3.

It should be noted however, the PUD rules do not seem to provide definitive guidance of what can be performed within the 50' PUD buffer are not precise, but speak of retaining trees and vegetation "wherever possible" and requiring additional plantings "as necessary". The adopted modifications to Ordinance 90-3, dealing with River Protection District buffers provide some guidance. Surely, buffers within the River Protection District would be stricter than any PUD buffer not within this district. The River Protection District buffers, under Section 4.25.2, subsection 2, state there is a specific setback of 50 feet for drainage systems and retention ponds, "with the exception of dry retention areas....." This language should be considered for a potential application to this project, similar to road crossings and utility crossings, since there is no defined language addressing dry retention in relation to the PUD perimeter buffer. We would ask that the town consider this going forward, as final development plans may come forward in the future related to this property.

2. Revise dry basin 4 and 5 configurations to avoid removal of significant trees.

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Response: Revised. Dry basin 5 was revised to save a 17" LO. Dry basins 2 and 4 were revised per the 50' buffer. This allowed for more significant trees to be saved. Please see enclosed updated site plan sheets C1.1 – C1.2.

3. Remove 30' stub to dirt trail at the end of the cul-de-sac at the eastern terminus of the project.

Response: Revised. Please see enclosed updated site plan sheet C1.2.

Watershed Management Review – Revisions Required

1. Provide the wetland impact permit #2003-1G-006.
Response: Please see wetland impact permit enclosed.
2. Show the feasibility of meeting the current SoLoCo standards of the proposed BMPs using the Compliance Calculator. The overall performance requirements for this area are located in the SWDM 3.5.5. At the time of the Pre-Development Plan submittal, you shall demonstrate the capacity of retaining the 95th percentile storm on-site with approved infiltration/filtering BMPs and meet Water Quality standards. The Compliance Calculator can be located: <https://www.townofbluffton.sc.gov/704/Southern-Lowcountry-Stormwater-Ordinance>. If you have any questions regarding SoLoCo Stormwater Design Manual or the Compliance Calculator, feel free to email scroty@townofbluffton.com.
Response: We are in the process of obtaining a geotechnical evaluation of the site. Upon completion, the Compliance Calculator for this project will be updated. Please see enclosed preliminary Compliance Calculator calculations.
3. Revise the narrative to include storm attenuation for the 50- and 100-year, 24-hour design storm events. (SWDM 3.5.2)
Response: We are in the process of obtaining a geotechnical evaluation of the site. Upon completion, an updated stormwater management memo with calculations will be submitted.
4. Provide a Natural Resource Inventory map that identifies resources listed in Table 2.2 of the SWDM. (SWDM 2.1.3 and 2.1.8)
Response: Please see enclosed Cultural Resources Overview. The existing conditions plan sheets (G2.1-G2.2) of the enclosed plans also denote the trees currently present onsite. In addition, a soils map is enclosed in this submittal.

Planning Review – Address – Not Required

Building Safety Review – Not Required

Beaufort Jasper Water and Sewer – Approved with Conditions

1. Pending submittal of water and sewer design in accordance with BJWSA 2023 Development Policy and Procedure Manual. Engineer of record and developer will need to coordinate with BJWSA staff on how best to provide water and sewer to the development.

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Response: Acknowledged. No water and sewer are proposed as part of this project.

Fire Department Review – Approved with Conditions

1. Comments may be provided at the development review committee meeting.
Response: Acknowledged.

Police Department Review – Approved

Transportation Department Review – Approved

We thank you for your attention to this project and look forward to receiving your approval. Please feel free to contact our office with any questions.

Sincerely,
THOMAS & HUTTON



Michael Lerque, PE

cc: Mr. Nathan Long, PE – Thomas & Hutton, long.n@tandh.com

MDL/fmb