



City of Puyallup

**Engineering Division**

333 S. Meridian, Puyallup, WA 98371

(253) 864-4165

www.cityofpuyallup.org

# Permit Review Correction Letter

**Permit Application #PRCCP20220589**

November 26, 2025

The City has completed the review of the above-mentioned permit submittal. All your review comments, conditions, and redlined plans can be found on the [City's permit portal](#). Redlined plans can be found on the City's Permit Portal in the "Reviews" section under "Documents Returned for Corrections". Below please find the permit submittal review comments from your review team and re-submittal instructions. Should you have any questions regarding the review comments, please contact the plan reviewer associated with the comment listed below.

## Re-submittal Instructions

To resubmit, you must address all comments and upload a ~~Correction Response Letter~~ that states how the corrections have been addressed in your resubmitted documents. Avoid using "upload additional docs" unless there is NO submittal item available for your document. Please Note: If you have any questions about how to resubmit, please contact the permit center.

- 1 Log in to your permits portal and navigate to the status page for this permit under the "My Items" tab by selecting the "Upload Submittals" button under the permit number.
- 2 For each submittal item listed re-submit a new version of the submittal item by clicking the "New Version" button next to the file name of the original file submitted. DO NOT click the 'browse' button unless the document you are submitting for that submittal item is not a new version of the originally submitted document. Click 'Upload Documents' at bottom of the page.
- 3 If any re-submittal fees have been assessed, you will need to pay your resubmittal fee at the time of resubmittal. Your resubmittal will not be processed until the fee has been paid.

## Corrections

Corrections to be addressed on the next set of resubmitted plans:

<b>Engineering Civil Review</b>	<b>Jamie Carter</b>	<b>(253)435-3616</b>	<b>JCarter@puyallupwa.gov</b>
<p>- Ecology defines sports fields (artificial and natural) as Pollution Generating Pervious Surface. However the underdrain collection and subsequent detention of the field run off makes this system an impervious surface. Provide details that this specific type of installation is not pollution generating or details of how the project will achieve enhanced water quality standards for the collected field run off. [Comment Correction; ; pg. N/A]</p> <p>- Findings of fact:</p> <ul style="list-style-type: none"><li>-This project is opting to attempt the Demonstrative Approach to stormwater management, specifically water quality, which is allowed under Vol I-1.6.</li><li>-According to the Manual: both the Presumptive and Demonstrative approaches are based on best available science and result from existing Federal and State laws that require stormwater treatment systems to be properly designed, constructed, maintained and operated to:<ol style="list-style-type: none"><li>1. Prevent pollution of state waters and protect water quality, including compliance with state Water Quality Standards.</li><li>2. Satisfy state requirements for all known available and reasonable methods of prevention, control and treatment (AKART) of wastes prior to discharge to waters of the State.</li><li>3. Satisfy the federal technology based treatment requirements under 40 CFR part 125.3.</li></ol></li></ul> <p>In order to achieve this the PROJECT CLAIMS that:</p> <ul style="list-style-type: none"><li>-Project will avoid materials that are pollutant sources such as those that leach significant copper and zinc or promote suspension of solids.</li><li>-Project will avoid erodibility and filtering in solids</li><li>-Project will provide settling volume</li><li>-Project will provide floatables retention</li></ul> <p>CITY RESPONSE:</p> <ul style="list-style-type: none"><li>-Submittal did not include product specific information to demonstrate the absence of pollutant sources of concern.</li><li>-Manufacturer technical documentation is vague and submitted studies do not pertain directly to the proposed field. Only two of the studies pertain to run off and they are both one time samples from decades ago on the east coast. One of these studies was conducted on crumb rubber and the other is a generic 'artificial turf field.' We need to know how your specific system is going to perform against the State and Federal Standards.</li><li>-The Artificial Turf Study submitted is irrelevant as it describes only crumb rubber applications. In addition, the study found elevated levels of pH in some samples and that heavy metals in some fields exceeded the acute aquatic life criteria and were defined as 'toxic'. Zinc was reported as present in concentrations orders of magnitude greater than other metals.</li></ul>			

- Simply stating that the fabric and infill materials function like a sand filter is not part of the Demonstrative Process.
- Settling volume not provided. Provide calculations based on current design to illustrate settling volumes.
- A standard outlet will prevent floatables from leaving the system, however standard design elements are not emerging technologies or alternative BMPs and are not considered mitigation or part of the Demonstrative Process.

[Comment Correction; ; pg. N/A]

#### - Testing Plan

This submittal has not provided adequate supporting data to determine whether or not the alternative approach is protective of water quality and satisfies state and federal water quality laws.

The project requests that a sampling program be instituted in order to show that after construction the field will conform to the water quality standards. This approach assumes the city has the resources and the motivation to monitor a (possible) multi-year sampling program. And then should the samples not conform, the project would like to then retrofit the field under the presumptive approach to stormwater mitigation, but the city asks: If that is possible, why not just design the retro-fit now? The manual warns that the Demonstrative Approach can be more arduous and time consuming. Knowing this it may be in the best interest for the project to consider all types of mechanical treatment devices in order to keep with the project schedule.

The testing plan submitted is not tailored for this type of project and mitigation strategy. The guidance provided for monitoring under the TAPE program may be more appropriate, but the city has serious concerns about allowing the field to be built and operated with little to no baseline data. There could be months or years of operation that may be polluting local water sources while more testing and progressive mitigation measures are installed.

[Comment Correction; ; pg. N/A]

- Overall the project has not demonstrated to the satisfaction of the regulatory agency that the design/plan will conform with state and federal constituent levels. The following statement sums up what we would require, and this report/project has not achieved this.

"The documentation for the demonstrative approach is a site-specific analysis that demonstrates that the proposed discharge will comply with ground water quality standards."

[Comment Correction; ; pg. N/A]

## Conditions

The items listed in the table below are conditions of the permit that do not need to be addressed on the next resubmittal of plans but will need to be fulfilled at some point in the permit review process. The "Condition Category" indicates the approximate phase of the permit process by which the condition must be fulfilled for the City to continue processing this permit. "Condition Status" if "Open" means that the condition has not been fulfilled, if "Resolved" means the condition has been fulfilled successfully. For some conditions that require submittal of a document to the City, those documents can be submitted via the Conditions Section of the [City's permit portal](#).

<b>Condition Category</b>	<b>Condition</b>	<b>Department</b>	<b>Condition Status</b>
Prior to Issuance	Certificate or Insurance/CG2012 must be received prior to issuance	Engineering Division	Open
Prior to Issuance	A Performance Bond must be received by the City of Puyallup prior to permit issuance. The Performance Bond shall be 150% of the estimated cost of work in the ROW per the approved cost estimate received prior to plan approval (attached in CityView Portal under Documents & Images section). See <a href="https://www.cityofpuyallup.org/DocumentCenter/View/16622/Performance-Bond-51122-appvd-by-Legal">https://www.cityofpuyallup.org/DocumentCenter/View/16622/Performance-Bond-51122-appvd-by-Legal</a> for more information.	Engineering Division	Resolved
Prior to Issuance	Projects that disturb more than one acre shall procure a Construction Storm Water General Permit	Engineering Division	Open
Prior to Completion	An approved reduced pressure backflow assembly (RPBA) device is required to be installed on the domestic water service per City Standard Detail 03.04.02 since the subject property abuts a secondary water source, e.g., Meeker Ditch, Clarks Creek, etc.  Upon approval of the installation by the city inspector, the backflow device shall be tested by a Washington State certified backflow assembly tester, and the test report results shall be submitted to the City prior to occupancy of the building.	Engineering Division	Resolved
Prior to Completion	Storm pond to be inspected against original CUP plans to determine if originally designed capacity is still available. Pond shall currently provide the capacity stated for full build out of the site. Should maintenance be required it shall be done as part of this project. [Jamie Carter @ 01/23/2025 12:36 PM]	Development & Permitting Services	Open

If you need assistance with resubmitting your corrections, please contact the Permit Center.

Sincerely,

City of Puyallup Permit Center  
(253) 864-4165 option 1  
[permitcenter@puyallupwa.gov](mailto:permitcenter@puyallupwa.gov)