

**From:** [Sandercock, Maria \(ECY\)](#)  
**To:** [Chris Beale](#); [Dougherty, Logan \(Consultant\)](#)  
**Cc:** [Ken Cook](#); [Mark Higginson](#); [Rutkowski, Emma \(Consultant\)](#); [Fieser, Aaron \(Consultant\)](#); [Erickson, Vivian \(Consultant\)](#); [Meyer, Zachary \(ECY\)](#)  
**Subject:** RE: SR 167/I-5 to SR 161 Stage 2 - Shoreline Coordination  
**Date:** Tuesday, July 5, 2022 9:03:34 AM

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Hi all,

We're supportive of the City's approach to permit this through only an SSDP without a CUP based on the information presented at our meeting. I agree that WSDOT should reach out to the Tribe to discuss the outfall. I'm looping in Zach Meyer, our shoreline/wetland permitting expert covering Pierce County, who has returned from leave – I've provided him with some background on the project and he can continue to help answer any permitting questions that might come up.

Thanks,  
Maria

Maria Sandercock | Acting Section Manager  
WA Department of Ecology | Southwest Region | Shorelands & Environmental Assistance Program  
cell: 425-256-1372 | [maria.sandercock@ecy.wa.gov](mailto:maria.sandercock@ecy.wa.gov)

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**From:** Chris Beale <[CBeale@PuyallupWA.gov](mailto:CBeale@PuyallupWA.gov)>  
**Sent:** Monday, June 27, 2022 10:54 AM  
**To:** Dougherty, Logan (Consultant) <[DoughLo@consultant.wsdot.wa.gov](mailto:DoughLo@consultant.wsdot.wa.gov)>; Sandercock, Maria (ECY) <[MARI461@ECY.WA.GOV](mailto:MARI461@ECY.WA.GOV)>  
**Cc:** Ken Cook <[KCook@PuyallupWA.gov](mailto:KCook@PuyallupWA.gov)>; Mark Higginson <[MHigginson@PuyallupWA.gov](mailto:MHigginson@PuyallupWA.gov)>; Rutkowski, Emma (Consultant) <[RutkowE@consultant.wsdot.wa.gov](mailto:RutkowE@consultant.wsdot.wa.gov)>; Fieser, Aaron (Consultant) <[FieserA@consultant.wsdot.wa.gov](mailto:FieserA@consultant.wsdot.wa.gov)>; Erickson, Vivian (Consultant) <[ErickVi@consultant.wsdot.wa.gov](mailto:ErickVi@consultant.wsdot.wa.gov)>  
**Subject:** RE: SR 167/I-5 to SR 161 Stage 2 - Shoreline Coordination

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Hi Logan,

I am comfortable in the interpretation you propose – I think this all will fall under an SSDP from my perspective. I am open to Ecology weighing in as well. In looking at a recent example with Milwaukee Bridge, I believe we have allowed all of these types of improvements on a similar project previously without a shoreline CUP. I will still want to see a greater level of plan detail on the Levee Road widening. I guess my main concern there is that the pavement will need to widen on the interior side of the river if we cannot shift the centerline. I feel like WSDOT replied at the meeting we held, and said this would not occur, but of course a set of more detailed plans would be good to confirm. Where is the floodway in this location? And as we discussed, we would like to see WSDOT documentation on outreach to Char and Russ at the Tribe to discuss the outfall and associated impacts.

Adoption of shoreline update will be soon, within the next two months (by August) is my understanding.

Let me know if you have any questions or further comments, happy to discuss further if needed.

Chris Beale | AICP  
Planning Division  
253.841.5418  
[cbeale@puyallupwa.gov](mailto:cbeale@puyallupwa.gov)

Submit for a permit and track submittals online using [CityView](#). Permit applications will now be accepted here: <https://permits.puyallupwa.gov/Portal>

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**From:** Dougherty, Logan (Consultant) <[DoughLo@consultant.wsdot.wa.gov](mailto:DoughLo@consultant.wsdot.wa.gov)>  
**Sent:** Friday, June 24, 2022 1:42 PM  
**To:** Chris Beale <[CBeale@PuyallupWA.gov](mailto:CBeale@PuyallupWA.gov)>; Sandercock, Maria (ECY) <[MARI461@ECY.WA.GOV](mailto:MARI461@ECY.WA.GOV)>  
**Cc:** Ken Cook <[KCook@PuyallupWA.gov](mailto:KCook@PuyallupWA.gov)>; Mark Higginson <[MHigginson@PuyallupWA.gov](mailto:MHigginson@PuyallupWA.gov)>; Rutkowski, Emma (Consultant) <[RutkowE@consultant.wsdot.wa.gov](mailto:RutkowE@consultant.wsdot.wa.gov)>; Fieser, Aaron (Consultant) <[FieserA@consultant.wsdot.wa.gov](mailto:FieserA@consultant.wsdot.wa.gov)>; Erickson, Vivian (Consultant) <[ErickVi@consultant.wsdot.wa.gov](mailto:ErickVi@consultant.wsdot.wa.gov)>  
**Subject:** Re: SR 167/I-5 to SR 161 Stage 2 - Shoreline Coordination

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Hi Chris and Maria,

As noted in the meeting notes attached in Emma's email below, this follow-up email will provide a description of the SR 167 Stage 2 Project activities that are proposed in the City of Puyallup shoreline jurisdiction. The initial code research we've conducted and our rationale for pursuing a Shoreline Substantial Development Permit (SSDP) is also included below. Please let us know if you agree with our interpretation of the City's SMP and SSDP pathway for the proposed transportation related activities within the City's shoreline jurisdiction.

**Proposed Activities within Shoreline Jurisdiction:**

There are two areas where Project activities are proposed in the Puyallup shoreline jurisdiction. See slides 9 and 10 of the presentation (attached in Emma's email below) for maps of these areas.

- Meridian/SR 161 Puyallup River Bridge:
  - New shared use path (SUP) within N Levee Rd interchange loop and crossing Puyallup River within footprint of existing bridge
  - Widening of N Levee Rd on inside of loop (to accommodate safe truck turning radius in the vicinity of the SUP)
  - Improvements ancillary to transportation use: signage, signals, illumination, drainage improvements
    - Drainage improvements include Filterra vaults and replacement in-kind of an existing stormwater outfall above OHWM of the Puyallup River
  - No work is proposed below the OHWM, and there are no proposed impacts to wetlands or streams. There are minimal stream buffer impacts to replace the existing stormwater outfall.
- South of the SR 512 Puyallup River Bridge:
  - Improvements ancillary to transportation use: installation of conduit on existing bridge (no ground disturbing activities)
  - No work is proposed below the OHWM, and there are no proposed impacts to wetlands, streams, or buffers.

**Permitting Approach:**

- Below is a condensed version of Table 7-1 in Chapter 7 of the City’s Shoreline Master Program: WSDOT is interpreting that all proposed activities fall under the “Recreation” and “Transportation Facilities” use/modification that are permitted outright under the SSDP process.

Shoreline Use and Modification	Puyallup River Urban Conservancy	Table Notes:	Notes on Proposed Project Activity:
Recreation	p <sup>3</sup>	3. Allowed only when the use is permitted by the underlying land use and zoning designation. Non-water oriented commercial/industrial development requires a conditional use permit if proposed in shoreline environment.	<ul style="list-style-type: none"> <li>Shared use path within ROW and Public Facilities zoning designation.</li> </ul>
Transportation Facilities	P		<ul style="list-style-type: none"> <li>N Levee Rd Widening (within loop)</li> <li>Signage, signals, illumination</li> <li>Installation of conduit on SR 512 Puyallup River Bridge</li> <li>Drainage facilities</li> <li>Conduit installation</li> <li>Other utilities</li> </ul>
Utility Development	p <sup>10</sup> , c <sup>11</sup>	<p>10. Allowed only when typical and normal to support and serve a permitted shoreline uses, for example, typically new or relocated distribution lines and individual service lines.</p> <p>11. Utility production and processing facilities, transmission facilities for the conveyance of services, and stormwater detention and treatment facilities are prohibited unless no alternative location exists, and then, only when a conditional use permit is acquired</p>	See notes under Transportation for proposed activities ancillary to transportation improvements:

- Relevant text from SMP Chapter 7, Section N: Transportation Facilities:
  - Section 1 (Definition):** I. “Transportation facilities” means roads and railways, **related bridges and culverts, fills, embankments, causeways, and truck terminals. Not included are off-street bicycle or recreational trails.**
  - Section 3 (Regulations):** XIV: “Transportation facilities shall be designed, constructed and maintained to contain and control all debris, overburden, **runoff, erosion and sediment generated from the affected areas.**”
  - Based on these definitions and use regulations, it appears that the ancillary drainage facilities for the proposed transportation use fall under the definition of transportation use and would therefore be permitted under the SSDP process.
- WSDOT is requesting confirmation of this interpretation due to the SMP language under the Utilities section. See following text sections in SMP Chapter 7, Section O: Utilities:
  - Section 3 (Regulations):**
    - Accessory utility facilities, such as those typical and normal to support and serve a permitted shoreline use shall be allowed in all shoreline environments. This will typically consist of new or relocated distribution lines and individual service lines.
    - The following utility facilities shall only be permitted when no other feasible alternative exists to locate in the city’s shoreline areas and **shall only be permitted through a shoreline conditional use permit:**
      - Utility production and processing facilities;
      - Transmission facilities for the conveyance of services; and,
      - Stormwater detention and treatment facilities (excluding infiltration facilities, such as rain gardens and permeable surfacing materials)**

VIII. Storm water management facilities, limited to detention/treatment ponds or vaults, media filtration facilities, lagoons or infiltration basins, shall only be permitted in the shoreline jurisdiction when the following provisions in addition to PMC 21.06 performance standards are met:

    - The storm water facility is designed and vegetated to mimic and resemble natural wetlands and meets applicable County or State storm water management standards and the discharge water meets state water quality standards; and
    - Low impact development approaches have been considered and implemented to the maximum extent feasible, in accordance with the WA State DOE storm water manual, as adopted by the City of Puyallup.

Please let us know if you have any concerns with the interpretation that the proposed drainage improvements would be considered an element of the transportation use and therefore permitted under a SSDP. Please let us know if you have any questions or would like to set up a follow-up meeting.

Also, please let us know when the SMP update is adopted and timeline that would go into effect.

Thank you,

**Logan Dougherty, WPIT**  
 Scientist II  
 Environmental Planning Department  
 Tel (425) 456-8581

**Logan Dougherty**  
 Environmental Scientist  
 WSDOT I-405/SR 167 Megaprogram

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**From:** Rutkowski, Emma (Consultant) <[RutkowE@consultant.wsdot.wa.gov](mailto:RutkowE@consultant.wsdot.wa.gov)>  
**Sent:** Friday, June 24, 2022 12:26 PM  
**To:** Erickson, Vivian (Consultant) <[ErickVi@consultant.wsdot.wa.gov](mailto:ErickVi@consultant.wsdot.wa.gov)>; Fieser, Aaron (Consultant) <[FieserA@consultant.wsdot.wa.gov](mailto:FieserA@consultant.wsdot.wa.gov)>; Dougherty, Logan (Consultant) <[DoughLo@consultant.wsdot.wa.gov](mailto:DoughLo@consultant.wsdot.wa.gov)>; Chris Beale <[cbeale@puyallupwa.gov](mailto:cbeale@puyallupwa.gov)>; [maria.sandercock@ecy.wa.gov](mailto:maria.sandercock@ecy.wa.gov) <[maria.sandercock@ecy.wa.gov](mailto:maria.sandercock@ecy.wa.gov)>  
**Cc:** Ken Cook <[KCook@PuyallupWA.gov](mailto:KCook@PuyallupWA.gov)>; Mark Higginson <[MHigginson@PuyallupWA.gov](mailto:MHigginson@PuyallupWA.gov)>; Greta Presley <[gpresley@herrerainc.com](mailto:gpresley@herrerainc.com)>; Ewbank, Mark - Herrera <[mewbank@herrerainc.com](mailto:mewbank@herrerainc.com)>; George Ritchotte <[gritchotte@herrerainc.com](mailto:gritchotte@herrerainc.com)>; Fuchs, Steve <[FuchsS@wsdot.wa.gov](mailto:FuchsS@wsdot.wa.gov)>; Fieser, Aaron A. <[Aaron.Fieser@wsp.com](mailto:Aaron.Fieser@wsp.com)>; Sandercock, Maria (ECY) <[MARI461@ECY.WA.GOV](mailto:MARI461@ECY.WA.GOV)>; Vivian Erickson <[verickson@HNTB.com](mailto:verickson@HNTB.com)>; Larkin, Mary <[mlarkin@northwestwatersheds.com](mailto:mlarkin@northwestwatersheds.com)>; Emma Rutkowski <[elrutkowski@HNTB.com](mailto:elrutkowski@HNTB.com)>  
**Subject:** RE: SR 167/I-5 to SR 161 Stage 2 - Shoreline Coordination

Hello,

Attached are meeting notes from our recent shoreline coordination meeting, as well as a copy of the presentation. Thank you again for meeting with us, and please do not hesitate to reach out with any questions.

**Emma Rutkowski (she/her)**  
 Scientist II  
 WSDOT I-405/SR 167 Megaprogram

Cell: (425) 503-7537

-----Original Appointment-----

**From:** Rutkowski, Emma (Consultant)

**Sent:** Monday, June 6, 2022 11:46 AM

**To:** Rutkowski, Emma (Consultant); Erickson, Vivian (Consultant); Fieser, Aaron (Consultant); Dougherty, Logan (Consultant); Chris Beale; [maria.sandercock@ecy.wa.gov](mailto:maria.sandercock@ecy.wa.gov)

**Cc:** Ken Cook; Mark Higginson; Greta Presley; Ewbank, Mark - Herrera; George Ritchotte; Fuchs, Steve; Fieser, Aaron A.; Sandercock, Maria (ECY); 'verickson@hntb.com'; Larkin, Mary; Emma Rutkowski

**Subject:** SR 167/I-5 to SR 161 Stage 2 - Shoreline Coordination

**When:** Thursday, June 16, 2022 4:00 PM-5:00 PM (UTC-08:00) Pacific Time (US & Canada).

**Where:** Microsoft Teams Meeting

Hello,

WSDOT is requesting a preliminary coordination meeting to discuss how the proposed SR 167/I-5 to SR 161 – New Expressway Project (Stage 2 Project) will demonstrate substantive consistency with local shoreline requirements for the limited unavoidable impacts within the City of Puyallup. Thank you for providing your availability to meet, and please do not hesitate to reach out should you have any questions prior to this meeting. Thank you!

**Emma Rutkowski (she/her)**

Scientist II

WSDOT I-405/SR 167 Megaprogram

Cell: (425) 503-7537

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