



BARGHAUSEN

June 26, 2024

Chris Beale
City of Puyallup
Planning Division
333 S. Meridian
Puyallup, WA 98371

RE: Responses to Comments
Freeman Road Logistics
4723 Freeman Rd E, Puyallup, WA 98371
City Permit No. P-21-0136
Our Job No. 21585

Dear Chris:

We have revised the plans and technical documents for the above-referenced project in accordance with your comment letter dated March 14, 2024. Enclosed are the following documents for your review and approval:

1. (a&b) Illumination Plans and Calculations by Herman Traffic dated June 21, 2024
2. Critical Area Report by Anchor QEA dated June 2024
3. Architectural Site Plan A1.1 dated June 14, 2024
4. Traffic Impact Analysis by Kimley Horn dated June 25, 2024
5. Preliminary Stormwater Site Plan by Barghausen Consulting Engineers dated June 25, 2024
6. Preliminary Civil Plans by Barghausen Consulting Engineers dated June 25, 2024
7. (a&b) Preliminary Landscape Plan by WBLA dated June 21 & 25, 2024
8. Geotechnical Pavement Evaluation by Terra Associates revised June 6, 2024
9. Groundwater Monitoring Memo by Terra Associates dated May 31, 2024
10. (a-g) Seven legal descriptions and exhibits for water, sewer, storm and gas draft easements have been provided.
11. Updated SEPA Checklist by Barghausen Consulting Engineers dated June 26, 2024

The following outline provides each of your comments in italics exactly as written, along with a narrative response describing how each comment was addressed:

Engineering Review – *Jamie Carter*; (253) 435-3616; jcarter@puyallupwa.gov

STORM

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1. *Long term wet weather monitoring results for infiltration feasibility were included in submittal as requested. If these results trigger stormwater redesign based upon requirements in the 2019 SWMMWW then include at civil submittal the corresponding BMPs for infiltrating. If there are to be no changes to the stormwater design based on this testing then provide justification based on all of the groundwater levels recorded. In other words incorporate the results of the long term wet weather monitoring (and all other in-situ testing) into the project storm report and plans completely.*

Response: Noted, the civil submittal incorporates the results of the long-term wet weather monitoring. For the site improvements, Terra Associates has commented during previous review rounds that an infiltration facility is not feasible due to volumetric constraints of the soil formation underlying the site. Rain gardens or similar LID facilities with smaller stormwater volumes appear to be feasible and will be considered during final construction permit plans. Rain Gardens do not count toward volume reduction from the site and are therefore excluded from flow control modeling.

For the offsite road improvements, an infiltration facility servicing the new impervious road surfaces near Levee Road is proposed. This facility is based on a separate groundwater monitoring analysis which is included in this submittal.

2. *For civil submittal include details and modeling for all post-vault structures and systems in order to analyze the regulated release and to confirm the 'no-rise' analysis of receiving waters and to confirm that no adverse changes to wetland hydroperiod will occur due to the release of runoff from the project. These analyses shall be in accordance with the Stormwater Management Manual for Western Washington, City of Fife Standards, and property owner concurrence including the Puyallup Tribe of Indians.*

Response: The civil submittal includes an updated drainage report with a detailed analysis of the oxbow wetland system. The post-vault pump system is designed with variable speed controls which meets the stream protection standard of the Stormwater manual. The vaults are modeled explicitly in the oxbow analysis. No adverse impact to wetland hydroperiods is anticipated because of the project.

3. *For this submittal the feasibility of the proposed stormwater design has not been demonstrated, and will therefore not be approved for land use. The Puyallup Tribe has recently expressed serious concerns about any additional water being released into the Oxbow area and are indicating that the current proposed design will not be viable.*

Response: The current design includes conveyance of project stormwater via force main to the west along 48th Street, outletting to the city conveyance system which eventually discharges to the oxbow. An updated oxbow analysis is also included indicating no adverse impacts to the oxbow.

4. *If infiltration facilities with more than one acre of contributing area are designed then mounding analysis may be required in accordance with Ecology Volume V Section 5.2.7.*

Response: There is a single infiltration system which is proposed for the offsite improvements near Levee Road. This system handles about 0.3 acres of impervious area and therefore does not require mounding analysis.

SEWER

1. *Because this property is over 300 feet from a public sewer connection, the applicant has the option to install an on-site septic system. If that option is not exercised then a public connection that satisfies all applicable standards and regulations shall be submitted for review by development engineering and operations staff. The current proposal/routing of a private force main through private properties has the potential to be approved. It is incumbent on the applicant to show the permissions, conforming design, and restoration details throughout the rest of the permitting process. At no time shall the applicant's inability to procure and record the proper easements for installation, restoration and perpetual maintenance of the private sewer line become a burden or an emergency for the city.*

Response: Noted.

2. *Because the Preliminary Site Plan process is intended to demonstrate feasibility of proposed utilities and utility extensions, the review cannot be approved without the draft easement documents and full cooperation and intent of the other parties (property owners who would be burdened by the easement) demonstrated. An email or letter could suffice if the easements are not prepared, although if all parties agree we cannot think of a reason to not prepare the draft easement for review.*

Response: The proposed utilities and utility extension easements will be provided, and the SEPA determination can be conditioned to ensure these are provided prior to site development permit issuance. Exact utility alignments are under review by neighboring property owners. The applicant understands approval of development permits will require easements to be in place. Legal descriptions and exhibits have been provided for review.

WATER

1. *Proposed concept seems reasonable, and the City of Puyallup Water Department has tentatively accepted the concept of the public water main across private property within 40-foot wide easements granted to the City. It is the responsibility of the applicant to negotiate all easements with the other private property owners and grant them to the city. If all of the necessary easements are not procured, then the design shall be reconsidered and redrawn at the applicant's expense. At no time shall the applicant's inability to procure the proper easements become a burden to the City and at no time shall the City be liable in any way for delays brought to the project timeline due to the applicant's inability to procure the proper easements or to build the water system to all applicable standards within those easements. All proposed construction within easements will be subject to review for impacts to critical areas, existing infrastructure and for restoration details.*

Response: Noted. Legal descriptions and exhibits have been provided for review.

2. *Because the Preliminary Site Plan process is intended to demonstrate feasibility of proposed utilities and utility extensions, the review cannot be approved without the draft easement documents and full cooperation and intent of the other parties (property owners who would be burdened by the easement) demonstrated. An email or letter could suffice if the easements are not prepared, although if all parties agree we cannot think of a reason to not prepare the draft easement for review.*

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Response: The proposed utilities and utility extension easements will be provided, and the SEPA determination can be conditioned to ensure these are provided prior to site development permit issuance. Exact utility alignments are under review by neighboring property owners. The applicant understands approval of development permits will require easements to be in place. Legal descriptions and exhibits have been provided for review.

3. *Remove easements from water line on Vector's own property. The water line is private here and no easement shall be required.*

Response: Acknowledged. Water easements on the site have been removed. Easements will remain for the water extension through private properties which are not owned by the applicant.

FIFE COMMENTS

1. *Label Freeman Rd. E. as City of Fife right of way (TYP)*

Response: Fife ROW has been clarified on plan sheets.

2. *Show city limits on all plan sheets and increase line weights for city name call outs (TYP)*

Response: Plans revised as requested.

3. *Include City of Fife approval stamp on relevant sheets*

Response: Fife stamp has been added as requested.

4. *Clearly label all private utilities as such (TYP)*

Response: Additional utility labels have been provided.

5. *Provide utility profiles for all and identify utility conflicts while maintaining City of Fife regulated clearances (Sheet C12 and others)*

Response: The requested level of detail will be provided during the construction drawing phase.

6. *Illumination plans shall be to City of Fife standards and review.*

Response: Illumination plans have been designed to meet City of Fife standards.

7. *Include both City of Fife and City of Puyallup notes where applicable*

Response: Both City of Fife and City of Puyallup notes have been included where applicable on Civil and Illumination plans

8. *Include City of Fife standard details where applicable*

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Response: Noted. Details provided are for example. Correct details will be shown on construction plans.

9. *FIFE COMMENT: Clearly indicate city of Fife limits on the east side of Freeman Rd. E. [21585-D-CIVIL-2023-12-01, Sheet C6]*

Response: City limits have been clarified.

10. *FIFE COMMENT: Private utility easements shall be secured before Preliminary Site Plan approval can be given. [21585-D-CIVIL-2023-12-01, Sheet C7]*

Response: The proposed utilities and utility extension easements will be provided, and the Preliminary Site Plan can be conditioned to ensure these are provided prior to site development permit issuance. Exact utility alignments are under review by neighboring property owners. The applicant understands approval of development permits will require easements to be in place. Legal descriptions and exhibits have been provided for review.

11. *FIFE COMMENT: Utility easements in the city of Fife shall be 15 foot minimum. [21585-D-CIVIL-2023-12-01, Sheet C7]*

Response: Storm easement adjusted to 15 foot width.

12. *FIFE COMMENT: Is approved by COF to have private utilities within a public row. The developer will need to enter into a franchise agreement with COF or easement. [21585-D-CIVIL-2023-12-01, Sheet C7]*

Response: Noted.

13. *FIFE COMMENT: Clarify purpose of this note and these dimension arrows. [21585-D-CIVIL-2023-12-01, Sheet C9]*

Response: Storm easement dimension updated.

14. *FIFE COMMENT: Provide more detail for emergency ingress/egress. Address 125' minimum spacing requirement from intersections or driveways in Fife's code. [21585-D-CIVIL-2023-12-01, Sheet C11]*

Response: Minimum spacing should not apply to an emergency-only driveway. This driveway will be fenced and inaccessible to normal traffic.

15. *FIFE COMMENT: Show right of way limits. [21585-D-CIVIL-2023-12-01, Sheet C12]*

Response: ROW is variable width. Dimensions added to sheet C12.

16. *FIFE COMMENT: More analysis is required to review the feasibility and conformance of the storm drainage plan at the intersection of Freeman Rd. E. and N. Levee Rd. E.*

a. *Downstream Analysis required*

- b. Clarify how free discharge will be allowed on private property and how this meets the 2019 SWMMWW.
- c. City of Fife will require a grading permit, street opening permit, and a right of way permit for the work to widen the south to west bound turning lane area. [21585-D-CIVIL-2023-12-01, Sheet C23]

Response:

- a. The downstream analysis for this basin is included in the revised drainage report.
- b. The discharge has been changed due to redesign of the system to full infiltration. Discharge pipe is significantly shorter and will only be used for emergency overflow.
- c. Noted.

17. FIFE COMMENT: Update detail from 2016 specs and provide gravel shoulder. [21585-D-CIVIL-2023-12-01, Sheet C23, Detail A]

Response: Detail revised as requested. Note the widening on Levee is significantly reduced due to 3-way stop configuration.

18. FIFE COMMENT: Provide surface (contour lines) elevations to confirm no ponding of standing water will occur. Final lift of pavement shall be continuous with seam locations based on paver dimensions and not sawcut locations. [21585-D-CIVIL-2023-12-01, Sheet C24]

Response: Final surface configuration subject to change during prep of construction-level drawings. Gradients along the road and curb line in this area are sufficient to prevent ponding. The paving hatches shown are provided to distinguish the limits of new vs existing paving to allow pricing of grind vs full-depth construction of base lift(s). The final lift will be continuous.

19. FIFE COMMENT: Construction easements are required for Fife tie-ins (TYP) [21585-D-CIVIL-2023-12-01, Sheet C25]

Response: Noted.

20. FIFE COMMENT: Transition at southern property line shall be ADA compliant and to Fife roadway standards. [21585-D-CIVIL-2023-12-01, Sheet C25]

Response: Acknowledged. To be provided during final construction drawings.

21. FIFE COMMENT: For arterial road, removal down to base, then 5" HMA over 2" CSTC (TYP) [21585-D-CIVIL-2023-12-01, Sheet C25]

Response: Freeman Road section has been updated based on new recommendations provided by Terra Associates.

22. *FIFE COMMENT: Update spec. [21585-D-CIVIL-2023-12-01, Sheet C25]*

Response: Noted. To be provided with construction plans.

23. *FIFE COMMENT: Reduce radii to local standards for access roads (25').[21585-D-CIVIL-2023-12-01, Sheet C28]*

Response: Radii reduced as requested.

24. *FIFE COMMENT: Truck turning prevention measures. [21585-D-CIVIL-2023-12-1, Sheet C27]*

Response: Per traffic meeting on 4/29/24, C-curb channelization is the agreed upon solution for truck turn prevention. C-curbing C 27 and details C 40 added to civil plans.

25. *FIFE COMMENT: No curb installation north of 48th St. E. [21585-D-CIVIL-2023-12-01, Sheet C28]*

Response: Curb removed from this part of the improvements.

26. *FIFE COMMENT:*

a. *Truck turning prevention*

b. *Measures butt joint [21585-D-CIVIL-2023-12-01, Sheet C29]*

Response:

a. Per traffic meeting on 4/29/24, C-curb channelization is the agreed upon solution for truck turn prevention. C-curbing and details added to plans.

b. A pavement butt joint has been called out here.

27. *FIFE COMMENT: More analysis is required to review the feasibility and conformance of the channelization and signage plan at the intersection of Freeman Rd. E. and N. Levee Rd.:*

a. *Show locations of guard rails and gravel shoulders. See COF road design standards.*

b. *Provide all lane widths and verify that 11 feet is sufficient.*

c. *This intersection will require illumination.*

d. *Provide striping details with legend.*

e. *Check site distance for possible relocation of stop sign next to turn lane. Consider creating an island for the sign next to the turn lane where indicated. See existing stop sign at 70th Ave. E. and N. Levee Rd. E. in Fife. [21585-D-CIVIL-2023-12-01, Sheet C31]*

Response:

a. Gravel shoulders are shown where space allows. Note that the east side of Freeman Road is not being widened due to ROW width constraints.

b. See Civil Plan Sheets for lane widths

c. Illumination System plans have been prepared by Herman Traffic to accommodate the revised channelization.

d. See Civil Plan Sheets for striping details

e. *Additional analysis is provided in the updated TIA for LOS and AWSC sight distance requirements. No analysis was conducted at the intersection of 70th at Levee, this intersection has been converted to an AWSC and has the same channelization that we are proposing as Freeman Road at Levee Road*

28. *NO COMMENTS AVAILABLE*

Response: N/A

29. *FIFE COMMENT: Where is signage for right turning lane? [21585-D-CIVIL-2023-12-01, Sheet C32]*

Response: See updated Civil Plan Sheet

30. *FIFE COMMENT: Is this adequate or visible enough? See C31. [21585-D-CIVIL-2023-12-01, Sheet C32]*

Response: See updated Civil Plan Sheet

31. *FIFE COMMENT: Show directional arrows. [21585-D-CIVIL-2023-12-01, Sheet C32]*

Response: See updated Civil Plan Sheet

32. *FIFE COMMENT: Add signage: semi-trucks prohibited from going west on 48th St. E. [21585-D-CIVIL-2023-12-01, Sheet C34]*

Response: see updated civil plan sheet

33. *FIFE COMMENT: Add signage warning drivers that north bound lanes will be reduced. [21585-D-CIVIL-2023-12-01, Sheet C34]*

Response: See updated Civil Plan Sheet

34. *FIFE COMMENT: Reduce turning radii to 25' on 48th St. E. [21585-D-CIVIL-2023-12-01, Sheet C34]*

Response: Radius revised as requested.

Engineering Traffic Review – Bryan Roberts; (253) 841-5542; broberts@puyallupwa.gov

Freeman Rd/Levee Rd Intersection:

1. *Widen intersection to add southbound left turn lane, southbound right turn lane, eastbound left turn lane, a center refuge lane on North Levee Road E for the southbound left turn to eastbound North Levee Road E movement. Intersection needs to accommodate truck turning movements.*

Response: See Civil Plan Sheet C45

2. *Interim All-way STOP at Levee/Freeman is not supported by the City of Puyallup. Only under the most intense land use proposal could an all-way STOP be considered. Once end user has been established, the City of Puyallup may require additional analysis to avoid all-way STOP control at Levee/Freeman.*

Response: Additional analysis is provided in the TIA for LOS and SWSC sight distance requirements.

3. *Lighting enhancements are required.*

Response: Illumination System plans have been prepared by Herman Traffic to accommodate the revised channelization

4. *Intersection modifications/widening to accommodate truck turning movements impact private property that is not owned by the applicant or WSDOT. How will the applicant mitigate this situation?*

Response: See truck turning movements on Civil Plan Sheets C43-C45.

5. *Sight Distance:*

- a. *Entering sight distance sight lines encroach into private property that is not owned by the applicant or WSDOT.*

- b. *How will the applicant ensure sight lines remain unobstructed?*

Response: AWSC is the solution to provide sight distance required at the Freeman Road and Levee Road intersection.

Freeman Rd:

1. *Proposed improvements and roadway widening along Freeman Rd frontage do not meet Five engineering standards. Eastern curb alignment along frontage is 21.5ft east of CL. City of Five standards require curb alignment to be 18ft from CL. This will create a misaligned curb alignment when future off-site frontage is constructed.*

Response: The curb line has been moved back to 18' from centerline. The road will have 36' paved width (three 12' lanes).

2. *Civil submittal shall provide detailed taper calculations for CL and fog line.*

Response: Noted. Detailed calculations are included on the civil channelization plans.

3. *Proposed streetlight near the north property line (#12) is located 12.3ft from roadway CL and is positioned at the end of a lane taper/transition. This is an obstruction hazard and needs to be moved to a safer location.*

Response: The light standard will be shifted east with the same offset as all other light standards.

4. *North Driveway:*

- a. *Sight distance analysis in Civil plans does not match separate sight distance exhibit. Driver eye setback needs to assume 18ft from face of curb. For both directions, assume future offset of face of curb for analysis.*
- b. *Proposed plastic delineators are not sufficient to restrict NB truck movements. Applicant must propose a more permanent solution to the City of Fife.*

Response:

- a. Per traffic meeting on 4/29/24, the sight distance at this driveway is not a major concern at this time due to WSDOT acquisition of the property to the north and the eventual removal of sight distance obstructions (trees and shrubs) which will no longer restrict sight lines. A revised interim sight distance exhibit is provided.
- b. Per traffic meeting on 4/29/24, C-curb channelization is the agreed upon solution for truck turn prevention. C-curbing and details added to Civil Plan C44.

5. *Southern driveway must be gated for emergency vehicle access only. This intersection does not meet sight distance requirement or driveway spacing standards to allow for non-emergency use.*

Response: Noted, an EVA gate is provided.

6. *Add signage at Valley Ave to deter trucks from using the north section of Freeman Rd.*

Response: Signage at the intersection of Freeman Road and Valley Ave already exists.



See picture.

22nd Ave NW

1. *Proposed pavement markings and striping do not meet City of Puyallup standards.*

Response: See Civil Plan Sheets for striping details

2. *Update striping design for Civil permit submittal.*

Response: See Civil Plan Sheets for striping details

Include COP standard detail for STOP sign and bar.

Response: See Civil Plan Sheets for stop sign and bar details.

3. *City standards require commercial driveways to be 30ft wide (Per Engineering standard 101.10(2) "No driveway entrance shall be wider than 30 feet unless otherwise approved by the Engineering Services staff")*

Response:

The project is designed for WB-67 trucks and the driveways on the east end of the cul-de-sac need to be wider than 30 feet to prevent trucks from driving on the landscaping. The midblock driveways are designed for fire truck access. Final design drawings will require review and approval as part of the permitting process with Puyallup Engineering Services staff. Turning movements are provided in the updated civil sheet to show that a future modification is feasible.

The two driveways at the East end of 22nd Ave NW are designed both for WB-67 trucks to enter and exit, and for fire truck hammerhead turn-arounds (shown on A1.1). Since 22nd Ave NW itself doesn't provide a fire truck turn-around per IFC 2018 D103.1, the alternate 120' hammerhead options are provided mostly on the project sites, but beginning in the ROW driveway. At the North driveway the hammerhead turn-around uses most of the drive width. See truck turn exhibits and on-site circulation exhibits on Civil sheets C43-C47.

These driveways have been modified to the minimum width possible (32'-8") with a 35' radius from 22nd Ave NW per the engineering standard referenced above. The fire requirement is for 28' internal turn radii coming from a 20' clear width. These 28' radii, 20' apart, are shown dashed on the updated A1.1 to demonstrate that these site entries have been reduced as much as possible.

The driveway from Freeman Road to the drive aisle north of Building A is flared to allow for one WB-67 truck to right turn into the site while another is queued on site, waiting to take a left turn out of the site. See Civil Plan C44.

4. *Streetlight design will be reviewed during Civil permit submittal.*

- a. *Remote photocell to be installed on service cabinet.*

- b. *Shorting caps are required.*

c. *Use Leotek GCM1-60J-MV-2R-40K-GY-105-XX. The luminaire listed within COP standards for commercial use is no longer manufactured.*

Response: The illumination plan now uses this design standard.

5. *Eastern Driveways are not aligned properly.*

Response: Per traffic meeting on 4/29/24, and subsequent email communications, a cul-de-sac design is proposed to mitigate the driveway misalignment.

6. *Per previous comment, there are no details that show how private home will access City ROW.*

Response: A separate driveway is now provided accessing the end of the cul-de-sac.

7. *To mitigate substandard eastern terminus access, City of Puyallup will require a large commercial cul-de-sac. Please show this in your next submittal.*

Response: A cul-de-sac is provided as discussed with the City of Puyallup Traffic Engineer.

48th St E

1. *Doesn't appear there are any improvements or deterrents proposed on 48th St East.*

a. *Project generated trips will increase volume on this substandard road segment.*

Response: For the anticipated warehouse uses, a maximum of 3 PM peak-hour passenger vehicle trips are expected to travel along 48th Street.

2. *Pavement analysis identified this road segment as in "poor" condition. Furthermore, there's insufficient asphalt depth to support grind and overlay option.*

a. *Coordinate with the City of Fife to determine the extent of roadway improvements.*

Response: Per revised recommendations by Terra Associates, the roadway design section has been updated to include a geosynthetic material over existing asphalt, followed by asphalt overlay. Per meeting with Ken Gunther, the City of Fife requires a minimum 2-lane road configuration which is slightly wider than the existing road. Anticipated final design is 20 to 22-foot paving width.

Planning Review – Chris Beale; (253) 841-5418; cbeale@puyallupwa.gov

1. *NOTE: Plan mark ups made by Planning on the current plan drawing are being marked as 'resolved' by Planning in relation to the December, 2023 resubmittal ONLY because the current version of the plans added additional sheets and the previous mark ups are no longer associated with the previous version. Not all comments are resolved. This is an error with our permit software. Please refer to the current comments and corrections, as noted.*

Response: Noted.

2. *CULTURAL RESOURCES: The May, 2022 archeological evaluation needs to be revised to include the new project land area that was not covered in the previous submittal. City staff received this feedback from Puyallup Tribe staff in response to the revised application materials. Please ensure your consultant uses Tribal accepted standards to conduct additional site investigation.*

Response: Environmental Science Associates (ESA) has conducted a supplementary archaeological survey of the 2.6 acre expanded Project Area. This consisted of a surface and subsurface archaeological survey across the two parcels. In total an additional 53 shovel and auger probes were excavated. Methods used during the supplementary survey were the same as those previously requested by the Puyallup Tribe. The results of the survey did not identify any archaeological resources. ESA recommends no further cultural resources work be conducted by the project and that it moves forward utilizing the existing cultural resources inadvertent discovery plan (IDP) for the project. This additional study is being distributed by ESA to the Puyallup tribe in direct correspondence. A copy will be provided to the city when finalized.

3. *SITE PLAN, LANDSCAPE: The frontage landscape area along Freeman Road needs a sloping berm with back-side retaining wall (3:1 slope) to meet the landscape standards (Type 1d standard, page 38, VMS). The 6' wall atop the berm shall be a masonry sound wall. Neighboring property owners have requested a sound wall to preserve residential areas from potential noise impacts, which could reasonably be expected with industrial users. Please update preliminary plans.*

LANDSCAPE: The updated landscape plans state there is "landscape berm refer to civil for the buffer around TPN 0420201032 (Almont). Prelim grading sheets C9 and C10 do not show a berm. Please provide a 3:1 berm with a wall around this residence.

Response:

One neighbor provided the city a comment in 2021 in an effort to screen one house from the truck court. The dock doors face east, allowing the building to screen his house from the truck court.

Freeman Road and the Almont property (TPN 0420201032) now have berms around them with retaining walls toward the (2) project properties (ie away from Freeman Road and the Almont property). These are called out on the Architectural Site Plan A1.1. and on Preliminary grading sheets C8 – C11. The landscape setbacks at these locations are 30' total, which with a 3:1 berm going up steadily would necessitate a 10' retaining wall. VMS Type 1d states that the retaining wall cannot exceed 6', so we cannot do a 3:1 berm for the full 30' width. Instead, we would propose a 4' retaining wall which is the maximum height for a non-engineered landscaping wall, and a berm that is steeper toward the property line (perhaps 3:1) and then gradually slopes up toward the 4' wall.

There is no need for a sound wall for this project.

In profile starting at the property line along Freeman Road, the project has 30 feet of landscaping in a berm with a retaining wall and a fence on top – which we propose to be a 6' tall wood fence. Then there's 6'-8" of space to the 40' tall building wall, which will be either a

sidewalk, river rock or landscaping depending on the location. All car and truck traffic will be to the rear of these buildings, or sometimes to the sides. Pedestrian traffic to access main building entries will be to the sides of the building. There is not a noise source between the fence and the building to shield.

Around the Almont property there is a proposed 4' landscape berm with retaining wall, and 6' high wood fence, as requested.

The project will comply with the city noise ordinance and there is no adverse noise impact to mitigate.

4. *SITE PLAN: Ensure the storm lines proposed do not conflict with proposed landscaping along the foundation lines of the building where the 15 foot landscaping requirement applies. The civil plan set appears to show a conflict that is not shown on the landscape plans. All utility lines will need to be shown on the final landscape plans at the time of civil. This may require adjustments to the civil utility plan sets.*

DESIGN REVIEW: SPECIFICALLY, proposed storm lines cannot be located in the foundation line landscape area on the north and south side of each of the buildings. Placement of those storm lines in those areas would practically eliminate tree planting that is required to meet design review code. Please adjust those storm lines to be under the adjacent parking stalls/drive aisles, aligned closely to the curb line, so as to not also impact tree planting in the parking lot landscape islands. Also, the area north of building A - shorten the paved parking stalls from 20' depth to 15' and transfer that area to the landscape. 20.26.400 requires 15' foundation line landscape. 10' is shown in that area.

LANDSCAPE: Please expect further detail comments on plant types, street tree selection and plant density/design at the time of civil plan submittal.

Response: The landscape plans and civil plans have been updated to remove any conflict. The City of Puyallup reviewer confirmed in the Summer of 2023 and reconfirmed in April of 2024 the foundation landscaping in the area described above can be 10 feet wide.

5. *UTILITIES: The sanitary sewer and water easement area shown on the Tribe's property (TPN 0420201008) will not approved, according to our conversation with Tribe staff. The applicant has not demonstrated the site being served by sewer or domestic water without these easements.*

Response: Noted. Easements from the Tribe are no longer proposed.

6. *STORMWATER: The oxbow hydroperiod analysis has not been submitted and is outstanding. Courtney Flora emailed city staff 01/08/24 stating the analysis would be completed at a later date. This is also noted in the Anchor report. This will require additional critical area and engineering review and coordination, once received. We anticipate coordination with the Tribe staff and Fife staff to occur during review of this report and Confluence will peer review. Tribal owned properties exist downstream at Oxbow wetland – applicant would need approval from Puyallup Tribe planning and fisheries departments, per previous comments from Tribe staff.*

STORMWATER: Is the off site stormwater line location in 48th Street and 78th Ave (private) sufficiently off set as to not need or require a construction or maintenance easement from the tribal trust properties (TPN 0420174032, -4031, 0420178007, 0420174707)? Will the permanent maintenance easement be wide enough to satisfy Fife requirements and avoid overlap on trust properties?

Response:

The oxbow hydroperiod analysis is included in this submittal in the revised drainage report. The Critical Areas Report by Anchor includes related updates.

The offsite stormwater force main line is designed within Fife ROW extending west past the tribal trust lots, then going north within private property within a minimum 15' easement granted by Papé and CenterPoint. No impact to or coordination with Tribal trust landowners is anticipated.

7. *CRITICAL AREAS: Confluence's review of Anchor's updated critical areas report will be submitted under a separate cover. WSDOT has additional comments (See comments inPortal - WSDOT, Fuchs email 01/30/24) on Anchor's critical area report as well that needs to be reviewed and response to comment provided by applicant.*

CRITICAL AREAS: City staff will not accept the impacts to wetland 87, 93 and stream 14 buffers. The proposed truck parking is not unavoidable impacts to achieve the project objective. Avoidance sequencing criteria requires "Avoiding the impact altogether by not taking a certain action or parts of an action." The project site can still be built and objectives achieved without the impacts to the buffers for these off site critical areas.

Response: Anchor QEA has revised Critical Area Report to fully addresses all Confluence and WSDOT review comments. This June 2024 report is included with this resubmittal.

The proposed Project requires the necessary and unavoidable fill of on-site Wetland B, located centrally on parcel 0420174075, and the on-site portions of critical area buffers (off-site Wetland 87, 93, and 146/148, and Stream 14/15) located on parcels 042174075 and 0420205016. Per PMC 21.06.610, projects should first attempt to avoid impacts all together by not taking certain actions. If actions cannot be eliminated, impacts should be minimized by restraining the magnitude of an action, using different technology, or taking steps to reduce impacts. For impacts that cannot be avoided or minimized, compensation or rectification for the impact should be provided by replacing, enhancing, or providing substitute resources or environments, followed by monitoring and reduction of the impact over time. Mitigation sequencing, outlined under PMC 21.06.210(84), for impacts to critical areas, is as follows:

1. Avoiding an impact altogether by not taking a certain action or parts of actions
2. Minimizing impacts by limiting the degree or magnitude of an action and its implementation
3. Rectifying impacts by repairing, rehabilitating, or restoring the affected environment

4. Reducing or eliminating an impact over time by preservation and maintenance operations during the life of the action
5. Compensating for an impact by replacing or providing substitute resources or environments
6. Monitoring the mitigation and taking remedial action when necessary

No practicable alternatives could avoid on-site Wetland B and the on-site portions of the off-site critical area buffer impacts and still fulfill the Project purpose and need due to the size, shape, location, and extent of the wetland and the required warehouse and parking capacity, building code requirements, zoning, and other factors. Project avoidance, minimization, and mitigation measures included site selection screening criteria, alternatives, and avoidance and design and construction measures. These measures have been described in the revised Critical Area Report. The Project currently proposes to provide compensatory mitigation for all impacts to Wetland B and to the on-site portions of off-site critical area buffers by purchase of wetland mitigation credits from the nearby Port of Tacoma Upper Clear Creek Mitigation Bank.

8. *SHORELINE: All project off-site work within the Shoreline Environment of the Puyallup River will require shoreline substantial development permits from Fife and Puyallup prior to land use approval. SEPA checklist needs revisions to address work within shoreline area; additional critical area reporting may be required. Applicant team should reach out to Chris Larson and Chris Beale to discuss scope of materials needed for those SD permits. This will require further refinements of roadway improvements, lane/intersection configuration, and stormwater management for Levee and Freeman Road prior to SD application. Verification of critical areas in the vicinity of this work is also pending/outstanding and specific critical area (shoreline management) reporting should be provided with any future SD permit application.*

Response: Anchor QEA will provide Shoreline Substantial Development Permit Applications and Shoreline Permit Compliance Memoranda to the cities of Fife and Puyallup as soon as possible once engineering design is preliminarily approved.

During a May 2023 site visit, Anchor QEA identified no other wetlands or wetland buffers within the road-widening area on parcel 0420201008. Similarly, no wetlands or wetland buffers were identified on parcel 0420201104 to the west of Freeman Road East. Therefore, no critical area impacts will occur because of road-widening. A portion of the road-widening area is within the shoreline zone of the Puyallup River. During Project permitting, two memoranda will be prepared that describe how the proposed work is consistent with shoreline regulations, one for the City of Puyallup and one for the City of Fife. See the updated Critical Area Report.

The SEPA checklist has been updated to include this information.

9. *TRAFFIC: Page 10 of the Kimley Horn TIA (Nov. 2023) states: "This is within the 6-year concurrency window for state law so we are entitled to utilize those improvements and shifts of traffic away from local roadways in the analysis." Please provide citation of state law and applicant analysis. Its not clear how a future capital project would change analysis of project impacts in the interim period between current conditions, current conditions w project, and the*

construction of a future capital project. Is the assertion here that a future capital project allows the applicant to not analyze or mitigate impacts for a 6 year period?

Response: <https://apps.leg.wa.gov/wac/default.aspx?cite=365-196-840>

WAC 365-196-840: Section 6(a)(ii) *The assertion is that the potential traffic impacts can be analyzed assuming the 6 year capital projects are completed.*

See the updated TIA for additional information.

10. **TRAFFIC:** *Please review and respond to all comments from Fife staff and traffic consultant team (KPG).*

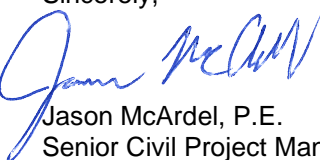
Response: Noted, all comments addressed above.

11. **TRIBE COORDINATION:** *Staff reached out to Tribe staff regarding easements shown on TPN 0420201008, street improvements appearing to cross onto TPN 0420201008 at Levee Road/Freeman Road, temporary construction easements and easements for storm water onto TPN 0420201008. All these issues appear on the plan set impacting PTOI land (developed basin off-site, sheet 5, storm water report; sheet C18, utility plans; sheet C31 & C32, civil off site roadway plans). From Andrew Strobel: "Vector has reached out to the Tribe for easements for private sewer on the Tribe's property off of 19th Ave. We are currently in negotiations regarding if the Tribe is amenable to these easements. However, the Tribe has not been informed of any need for road ROW or construction easements to widen Freeman Road and are not in negotiations to supply any of the necessary easements related to this site plan. For the purposes of the record and commenting on the project the Tribe is in no position to support those easements until Vector has secured them from the Tribe. I would inform the applicant that it would be difficult to approve this site plan without the consent of the Tribe and either engage with us on negotiations or come up with a new site plan that excludes using the Tribe's property."*

Response: Noted. A private sewer easement from the Tribe is no longer proposed.

We believe that the above responses, together with the enclosed revised plans and technical documents, address all of the comments in your letter dated March 14, 2024. Please review and approve the enclosed at your earliest convenience. If you have questions or need additional information, please do not hesitate to contact me at this office. Thank you.

Sincerely,



Jason McArdel, P.E.
Senior Civil Project Manager

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enc: As Noted
cc: