



December 23, 2024

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

RE: Responses to Preliminary Site Plan Comments  
Freeman Road Logistics  
4723 Freeman Rd E, Puyallup, WA 98371  
City File 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 August 22, 2024. Enclosed are the following documents for your review and approval:

1. N Levee Road & Freeman Road E Memo prepared by Kimley Horn dated October 24, 2024
2. SEPA Checklist by Barghausen Consulting Engineers dated December 23, 2024
3. Critical Area Report by Anchor QEA dated December 2024
4. Floodplain Analysis by Barghausen Consulting Engineers dated December 16, 2024
5. Off-site Infiltration Rate Memo by Terra Associates dated December 3, 2024
6. Civil Plans by Barghausen Consulting Engineers dated December 20, 2024
7. Stormwater Site Plan by Barghausen Consulting Engineers dated December 20, 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:

**Planning Review – Chris Beale; (253) 841-5418; cbeale@puyLLUPWA.GOV**

1. *Previous comments regarding updated archeological report are satisfied with the submittal of the revised archeological report. City staff shared the report with Puyallup Tribe staff.*

**Response:** Noted, thank you.

2. *Conditions have been added regarding requirements for a 6' landscape slope (5:1 slope based on the width of the landscape area, with 6' back wall and 6' tall wood fence atop) along Freeman Road site frontages, consistent with VMS design standards. Grading and*

*landscape plans will need to be amended at the time of civil permit submittal. See conditions list.*

**Response:** Noted.

3. *Most of the previous comments regarding site plan and design review are resolved with updated plans. The wetland report notes that parking needs to be reduced to the minimum PMC requirements to achieve the avoidance sequencing standards in the CAO. Other issues remain outstanding in the Confluence letter that need to be addressed separately.*

**Response:** Parking has been revised to avoid any impact to the Stream buffer areas and has minimized unavoidable impacts to Wetland 87 & 146/148 to the maximum extend possible while still meeting the PMC parking space and emergency access requirements. See revised plans for details. Responses to the Confluence Letter are outlined in the table below.

<b>3<sup>rd</sup> Confluence Review Comments</b>	<b>Anchor QEA Responses</b>
<p>14. <i>“Stream 15 crosses Freeman Road, continues west, and intersects with the proposed drainage easement (Figure 4 shows this). Section 4.3 of the 2024 CAR states that the stream is not located on parcel 0420174032. Section 4.4.1 of the 2024 CAR does not describe Stream 15 as crossing the drainage easement on 78<sup>th</sup> Avenue E. However, several sources show Stream 15 crossing Freeman Road, and flowing across parcel 0420174032, and parcel 0420174707.</i></p> <p>1. <i>Update stream description.”</i></p>	<p>15.</p> <p><i>Streams descriptions have been updated See sections 3.2,4.3 and 4.4.1.</i></p>
<p>2. <i>Impacts to critical areas and buffers must meet Fife Municipal Code</i></p>	<p>2.</p> <p><i>No impacts to critical areas and their buffers in City of Fife are proposed. A previous design concept included utility routing through the City of Fife, but this is now longer proposed. The existing wetland and stream buffers are interrupted by the impervious surfaces of 78<sup>th</sup> Avenue E. City of Fife</i></p>

	<i>parcels are addressed in CAR Section 4.2.3 Section 4.2.4, Section 4.2.1, and Section 6.1.7.</i>
<p>3.</p> <p><i>“A wetland has been identified on parcel 0420174707 in association with a Tribal mitigation project. The existing gravel road shown on Sheet C13 of 47 from the Preliminary Drainage Outlet Plan does not look like it extends all the way to the connection. It is not clear if drainage work will occur beyond an established road. Impacts to critical areas and buffers must meet Fife Municipal Code.”</i></p>	<p>3.</p> <p><i>No impacts are currently proposed to critical areas or buffers identified on parcel 0420174707 in association with a Tribal mitigation project. A previous design concept included utility routing through the City of Fife adjacent to parcel 0420174707, but this is now longer proposed. This is addressed in CAR Section 6.1.7.</i></p>
<p>4.</p> <p>Wetland B is a Category III wetland. Update Table 4 with correct information.</p> <p>Wetland A is a Category II wetland with 150-foot buffer. Update Table 8 with correct information, including habitat and water quality scores.</p>	<p>4.</p> <p><i>Table 4 and Table 8 are revised with correct rating and buffer width information.</i></p>
<p>5.</p> <p><i>“Please provide figures that show the stormwater extension work along 78th in relationship to wetlands, streams, and buffers.”</i></p>	<p>5.</p> <p><i>No impacts to critical areas and their buffers in City of Fife are proposed. A previous design concept included utility routing through the City of Fife, but this is now longer proposed. The existing wetland and stream buffers are interrupted by the impervious surfaces of 78<sup>th</sup> Avenue E. City of Fife parcels are addressed in CAR Section 4.2.3 Section 4.2.4, Section 4.2.1, and Section 6.1.7. The current design plans including the proposed utility alignments are included in CAR Appendix A.</i></p>

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<p>6.</p> <p><i>“City staff will not accept the impacts to Wetlands 87 and 93 and Stream 14 buffers. The proposed truck parking impacts are not unavoidable 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. The site plan and report will need to be modified. Section 7.4.2 states that 1 parking space per 3,000 square feet is desired. Reduce parking stalls within the proposed buffers to the minimum required by PMC.”</i></p>	<p>6.</p> <p><i>PMC 20.55.010 (32) (c) requires</i></p> <p><b>(c) Establishments having more than 100,000 square feet of gross floor area shall provide one space for each 3,000 square feet of gross floor area.</b></p> <p>An earlier project design included parking space and associated impervious areas that overlapped with the Stream 14/15 buffers that extend onto the southeast corner of Main Development Area parcel 0420174075 and the northeast corner of Main Development Area parcel 0420205016. The current design has been reconfigured to avoid any impact to the Stream 14/15 buffer areas (Appendix A). Additionally, the current design plan has minimized impacts to Wetland 87 and Wetland 146/148 buffers that project on site to the maximum practicable extent possible while still meeting PMC parking space and emergency access requirements. Unavoidable wetland buffer impacts will be mitigated by purchase of wetland mitigation credits from the nearby Mitigation Bank and by on-site buffer mitigation enhancement.</p>
<p>7.</p> <p><i>“Wetland 146/148: Section 7.4.2 states that 1 parking space per 3,000 square feet is desired. Reduce parking stalls within the proposed buffers to the minimum required by PMC.”</i></p>	<p>7.</p> <p><i>See response to Confluence Comment No. 6. The proposed project will have greater than 100,000 square feet of gross floor area. The current design has been reconfigured to avoid any impact to the Stream 14/15 buffer areas (CAR Appendix A). Additionally, the current design plan has minimized</i></p>

	<p><i>impacts to Wetland 87 and Wetland 146/148 buffers that project on site to the maximum practicable extent possible while still meeting PMC parking space and emergency access requirements.</i></p>
<p>8.</p> <p><i>“Indirect impacts: Based on the information provided in Appendix D, the assumption that WSDOT wetlands will have buffers contained to their parcels is not correct. Wetlands will be created to the property line. The plans show wetland reestablishment and restoration to the property line with a perimeter buffer to the compensation area, which in this case is wetland.</i></p> <p><i>Provide indirect impact assessment based on the existing wetlands not future conditions.”</i></p>	<p>8.</p> <p>Ecology requires that mitigation wetlands include onsite non-creditable buffer areas, and these buffers <b>are not</b> permitted to extend onto adjoining properties. Despite the eventual future removal of off-site wetlands as part of the SR 167 Completion project, Vector has provided equitable compensation for the impacts to critical areas as they currently exist by proposing purchase of the required number of wetland mitigation credits from the Port of Tacoma Upper Clear Creek Wetland Mitigation Bank and by proposing on-site mitigation enhancement plantings.</p>
<p>9.</p> <p><i>“Wetland 146/148:</i></p> <ul style="list-style-type: none"> <li><i>• Per PMC 21.06.930, demonstrate how mitigating at the mitigation bank provides wetland buffer functions greater than or equivalent to those lost by reducing the buffer from 80 feet to 0.”</i></li> </ul>	<p>9.</p> <p><i>The proposed impacts to Wetland 146/148 buffers due to PMC development requirements (see Anchor QEA responses to Confluence Comments No. 6 and No. 7) have been reduced to the maximum extent practicable. The existing Wetland 146/148 buffer that extends onto the Main Development Area is currently degraded and has been highly impacted by previous land use at the site. The existing buffer area provides low water quality, hydrology and habitat functions to the off-site wetlands due to compacted soils, the presence of invasive species, lack of canopy layer and shading. Credits purchased from a mitigation bank are used will re-establish, rehabilitate and</i></p>

	<p><i>protect high quality riverine Category I wetland habitat and create a mosaic of forested, scrub-shrub, emergent and riverine wetland conditions and buffers in the same watershed. Compensation at the Port of Tacoma Clear Creek Mitigation Bank will be of higher value and provide greater functions than the existing conditions and will be preserved in perpetuity. The proposed on-site mitigation enhancement planting will provide additional benefit to the off-site wetland buffers prior to their removal as part of the HW 167 Completion Project.</i></p>
<p>10.</p> <p><i>“Address impervious surfaces constructed within 50 feet of the wetland boundary. Also address how hydroperiods will be protected.”</i></p>	<p>10.</p> <p><i>The proposed impacts to Wetland 146/148 buffer are unavoidable due to PMC development requirements (see Anchor QEA responses to Confluence Comments No. 6 and No. 7) and have been further minimized by reconfiguration of parking spaces at the north end of Building A as far from the wetland as possible. The existing Wetland 146/148 buffer that extends onto the Main Development Area is currently degraded and has been highly impacted by previous land use at the site and is poorly protective of wetland hydroperiods. Compensation at the Port of Tacoma Clear Creek Mitigation Bank and on-site mitigation enhancement will be of higher value and provide better protection of wetland hydroperiods than the existing conditions and will be preserved in perpetuity.</i></p>
<p>11.</p>	<p>11.</p> <p><i>The proposed mitigation is not “innovative.” The project is following PMC 21.06.980 (3). Wetland banking</i></p>

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<p><i>“If the intent is to meet PMC 21.06.640 Innovative Mitigation, please provide a more detailed justification.”</i></p>	<p><i>is a well-established and highly successful mitigation approach that is preferred in Federal Government regulations and guidance provided by Washington Department of Ecology.</i></p> <p><i>CAR Section 8.4 provides the level of detail required by PMC 21.06.980 (3) Wetland Mitigation Banks. The City of Puyallup has not approved this type of mitigation in the past, but PMC allows it so long as the Director approves use of the Port of Tacoma Upper Clear Creek Mitigation Bank site and that the mitigation proposed by the project provides appropriate compensation. This decision is still pending approval by the Director.</i></p>
<p>12.</p> <p><i>“Please use the correct mitigation ratios as defined by PMC 21.06.970(1)(e). All impacts to wetland buffers shall be mitigated at a 1:1 ratio, which should translate to 0.2:1 mitigation credit per Upper Clear Creek Mitigation Bank Instrument.”</i></p>	<p>12.</p> <p><i>Table 11 and Table 12n the CAR have been updated with the mitigation ratios required by PMC.</i></p>
<p>13.</p> <p><i>“Indirect Impacts: reevaluate mitigation for indirect impacts to be consistent with existing conditions and not proposed future offsite work.”</i></p>	<p>14.</p> <p><i>Vector is proposing to compensate for the impacts to off-site critical areas as they currently exist by proposing purchase wetland mitigation credits from the Port of Tacoma Upper Clear Creek Wetland Mitigation Bank and by proposing on-site mitigation enhancement plantings.</i></p> <p><i>On-site mitigation will improve the overall ecological functions of the wetland buffer area above what is currently existing at the site, and off-site mitigation at the Bank will support wetland rehabilitation and re-</i></p>

	<i>establishment to support watershed level functions within the greater Puyallup River basin.</i>
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4. *Previous comments regarding water and sewer services remain as easements have not been secured from Schenk's property per feedback from Schenk and their attorney. These comments will need to be addressed under Engineering review.*

**Response:** Noted. Utility routing issues are ongoing. The current design avoids Schenk property by routing utilities in the public ROW south on Freeman Rd, then East on Levee Rd.

5. *A comment letter from Confluence is provided for review and response by Anchor consulting.*

**Response:** Please see Anchor Responses within the table starting on page 2 of this letter.

6. *Planning resolved our comments regarding the TIA and off site downstream wetland hydroperiod analysis; however, other disciplines (Engineering and Traffic) and agencies (Fife and PTI) have remaining comments. Planning has only resolved our previous comments so they are off our review items list. Issues remain needing resolution prior to SEPA issuance. Please review the full contents of this letter.*

**Response:** Noted.

7. *Previous comments regarding needed temporary and other easements on PTI property and Tribal Trust lands are marked as resolved from our review items list and moved to the conditions list. Its unclear how roadway improvements will be constructed at Levee and Freeman Road without direct construction impacts to the Tribe's parcel in the NE corner and questions remain about the feasibility of constructing the discharge line in 78th near the PTI wetland property. These issues remain needing resolution at the time of construction permit submittal(s) and conditions will apply requiring Vector to prove appropriate legal rights/access are provided by PTI and/or BIA to allow any impacts to those affected tribal lands/tribal trust related properties. From Andrew Strobel: "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:** See the memo by Kimley Horn for details. As the left turn lane is not warranted from project traffic Kimley Horn has evaluated alternative designs. The preferred improvement here is an all-stop control at the intersection which improves the baseline LOS in the PM Peak to the acceptable LOS C. This type of stop-controlled intersection exists adjacent to the site at 70th Ave E And North Levee Road.



This would also eliminate the need for an EB left turn pocket, allowing existing sightlines to be maintained. Modification of the intersection control type would bring the available existing sight lines into compliance by modifying the needed sight distance from Entering Sight Distance clearance to intersection sight distance (AASHTO Case E), requiring clear sight lines to “the first stopped vehicle on each approach” only.

This all-way stop control condition could be an interim condition until the SR-167 extension is completed and volumes shift from N Levee Road. After the Development is constructed and the extension is complete a level of service analysis of the intersection could be completed to determine if the volumes have decreased enough and the sight distance is improved to justify removal of the stop signs on N Levee Road.

The full off-site SEPA mitigation for this intersection would include the southbound left-turn channelization and installation of all-way stop control signing at this intersection. This is consistent with appropriate design standards including MUTCD and AASHTO. This would mitigate the Development’s impact to the intersection.

8. *Previous comments regarding SSDP permits for the improvements to Levee and Freeman Road intersection are marked as resolved from our review items list. Future permits may apply, as noted/acknowledged by the applicant's 06/26/24 response letter. Issues related to the improvement design need to be resolved prior to SSDP application.*

**Response:** Acknowledged.

9. *UTILITIES: The sanitary sewer and water easement area shown on the Schenk's property is not approved, according to our conversation with Schenk's attorney (July, 2024). Schenk's attorney is indicating to City staff that they do not plan to grant easements to the development. The applicant has not demonstrated the site being served by sewer or domestic water without these easements.*

**Response:** Noted. The current design avoids Schenk property by routing utilities in the public ROW south on Freeman Rd, then East on Levee Rd.

10. *STORMWATER: Off site Fife oxbow hydroperiod analysis. 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. Fife staff also will need to provide concurrence. UPDATED REVIEW AUGUST 2024: At the time of Planning review, PTI and Fife were still reviewing and have not provided concurrence or approval of the modeling analysis.*

**Response:** Noted. The current design avoids discharge to the oxbow by routing stormwater in the public ROW south on Freeman Rd, then East on Levee Rd, connecting to existing Puyallup storm infrastructure to the southeast of the project.

11. *CRITICAL AREAS (August, 2024): See Confluence review letter under a separate cover.*

**Response:** Responses to Confluences review is in a table starting on page 2 of this letter.

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

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

**Response:** Signage will be fully designed during engineering permitting.

13. *FIFE COMMENT: BOUNDARY LINE ADJUSTMENT WILL BE NEEDED BETWEEN CITIES. [062624 PRELIM CIVL-2024-06-25 - RESUB, Sheet C9]*

**Response:** Comment acknowledged.

14. *FIFE COMMENT: WILL REQUIRE THIS TO BE PRIVATE. [[062624 PRELIM CIVL-2024-06-25*

*- RESUB, Sheet C9], Sheet C9]*

**Response:** Storm discharge is now being proposed to be within Puyallup ROW and routed south on Freeman, east on Levee Rd. The applicant wishes to also make the lift station a public facility to simplify maintenance and operation. We note this facility is also pumping stormwater originating from Freeman Rd and 22<sup>nd</sup> Ave NW.

15. *FIFE COMMENT: COF APPROVAL STAMP BLOCK ADDED FOR CIVIL AND STREET DESIGN. [062624 PRELIM CIVL-2024-06-25 - RESUB, Sheet C10]*

**Response:** The street design is on separate sheets of the plan set.

16. *FIFE COMMENT: NEW PAVEMENT SECTION PER EARLIER GEO REPORT 3" HMA OVER 4" PER FMC. [062624 PRELIM CIVL-2024-06-25 - RESUB, Sheet C12]*

**Response:** 48<sup>th</sup> Street is no longer included in the project.

17. *FIFE COMMENT: ADD "FLYING T" AT INTERSECTION. [062624 PRELIM CIVL-2024-06-25*

*- RESUB, Sheet C12]*

**Response:** Preliminary linework for this configuration is added to the plans.

18. *FIFE COMMENT: ADD TRASH RACK. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C23]*

**Response:** Trash rack noted. Details to be provided during engineering permit.

19. *FIFE COMMENT: NEEDS TO BE IN PUBLIC ROW OR IT WILL HAVE TO BE PRIVATELY OWNED AND MAINTAINED. NEED LEGAL PERMISSION TO DISCHARGE TO PRIVATE PROPERTY. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C23]*

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**Response:** The pipe in question is only for emergency overflow and is discharging to the same location as the existing road. Applicant to get an easement or additional ROW space to construct the outlet. We note that the city is currently discharging water during high intensity rain events to several properties all along Freeman Road currently. Since this overflow pipe is limited to >100 yr interval storm, the proposed situation is much better than current.

20. *FIFE COMMENT ; SHOULDER WORK WILL BE NEEDED. [062624 PRELIM CIVIL-2024-06-25- RESUB, Sheet C23]*

**Response:** Shoulder gravel specified. The extent of this work will be highly dependent on available space. This project will not be extending the levee prism on the south side.

21. *FIFE COMMENT; REVISE TO 5 INCHES (TYP ALL SHEETS). [062624 PRELIM CIVIL-2024-06-25*

*- RESUB, Sheet C23]*

**Response:** HMA section depth revised as requested.

22. *FIFE COMMENT: ADD CROSS SECTIONS. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C24]*

**Response:** The infiltration trench is shown in profile on the revised plans.

23. *FIFE COMMENT: SHOW PAVEMENT/SHOULDER TRANSITION SECTION. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C24]*

**Response:** The Freeman Rd section has vertical curb defining the edge. There is no gravel shoulder planned. The comment appears to be pointing to the area where the infiltration trench begins. This is not a gravel shoulder. Infiltration trench is a below-ground feature. No transition is needed.

24. *FIFE COMMENT: INSTALL WEDGE CURB. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C24]*

**Response:** To be determined during civil permit.

25. *FIFE COMMENT: 5" HMA OVER 7" CRB PER ORIGINAL GEOTECH REPORT AND PER FMC. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C24]*

**Response:** Pavement section revised as requested.

26. *FIFE COMMENT: 5" (TYP). [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C25]*

**Response:** Pavement section revised as requested.

27. *FIFE COMMENT: SEE SHEET 24 FOR REQUIREMENTS (TYP). [062624 PRELIM CIVIL-2024-06-25*

- RESUB, Sheet C25]

**Response:** Section revised per comments on C24.

28. *FIFE COMMENT: USE C CURB INSTEAD OF TRAFFIC CURB. [062624 PRELIM CIVIL-2024-06-25*

- RESUB, Sheet C27]

**Response:** Updated as requested.

29. *FIFE COMMENT: ADDRESS COMMENTS IN 8-14-24 MEMO FROM KPG PSOMAS. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C31]*

**Response:** See Kimley Horn Memo provided.

30. *FIFE COMMENT: TRUCKS NO RT TURN. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C34]*

**Response:** Sign added to plans.

31. *FIFE COMMENT: NEED A NO TRUCKS RIGHT TURN SIGN. [062624 PRELIM CIVIL-2024-06-25*

- RESUB, Sheet C35]

**Response:** Sign callout added to plans.

32. *FIFE COMMENT: ADD COF TO NOTES THAT SAY CITY OF PUYALLUP AS WELL IF BOTH JURISDICTIONS ARE REQUIRED OR CHANGE CITY OF PUYALLUP TO COF IF IT IS COF'S INFRASTRUCTURE NOTES. [062624 PRELIM CIVIL-2024-06-25 - RESUB, Sheet C35]*

**Response:** Comment Acknowledged

33. *FIFE COMMENT: CALLOUT FOR PROPOSED INLET CONNECTION W/DETAIL. [062624 PRELIM CIVL-2024-06-25 - RESUB, Sheet C13]*

**Response:** This connection point is no longer being used.

34. *The criteria for engineering during the Preliminary Site Plan phase for large commercial projects is feasibility. The most recent submittal is still lacking in any concrete feasibility for sewer, water, and storm most notably in procuring easements in order to construct the private sewer and public water and procuring permission to discharge stormwater to the Oxbow Complex. Requesting that the approval is moved to SEPA review does not follow our procedure. In addition, the current SEPA checklist does not include any useful information about the utilities and is incorrect in its statement that sewer and water are currently available at the site. While the actual recording and finalization of the easements is not required at this*

*stage, written verification from affected property owners that they are entering into agreements with the developer will be required prior to approval of this Preliminary Site Plan. Draft easements were reviewed, but an in-person meeting with the attorney for the owners of the Schenk complex have indicated that there has been no productive communication and further that they have little to no interest in granting an easement through their property. City of Fife has also requested that written communication from Grantors be provided prior to approval.*

**Response:** The plans have been revised to route utilities south on Freeman, then east on Levee Rd to connect to existing Puyallup infrastructure to the southeast of the project. Utility routing will remain in ROW and not require easements.

35. *The flood report (21585-R-FLOOD-2022-10-14) lacks details and is not complete enough to convince reviewers that the flood plain engineering and mitigation is feasible at this time. Resubmit report with detailed calculations and additional profiles. Provide all information to illustrate satisfactory compensatory storage. From Puyallup Municipal Code 21.07.060 (f):*

*Compensatory Storage.*

*(i) Except as set forth in subsection (1)(f)(ii) of this section, development proposals that will cause an increase in the water surface elevation of the base flood must provide compensatory storage to the extent necessary to avoid “take” of any species listed as threatened or endangered under the ESA. Such compensatory storage must:*

*(A) Provide equivalent elevations to that displaced – unless the project is located within the AO zone. AO zone projects are not required to comply with the equivalent elevation requirement;*

*(B) Be hydraulically connected to the source of flooding;*

*(C) Be provided in the same construction season and before the flood season begins on September 30th;*

*(D) Occur on site or off site if legal arrangements can be made to assure that the effective compensatory storage volume will be preserved over time; and*

*(E) Be supported by a detailed hydraulic analysis that is prepared by a licensed professional engineer.*

**Response:** Additional detail and information has been added to the floodplain report and included in this submittal. More grading and attention to flood flow path has been applied to the site.

36. *The sewer force main calculations (21585-R-SSWR-Calcs) include off site contributions. The current design for this force main is private and is essentially a long lateral (side sewer). Under this designation no other properties would be allowed to discharge into this line. Revise the report to reflect this fact prior to civil application.*

**Response:** The plans have been revised to make the sewer lift station and force main a public utility. However, provisions for contributions other than Freeman Logistics are not included in the analysis currently. Some additional force main capacity is anticipated and will be addressed during preparation of civil permit documents.

37. *FIFE COMMENT: We won't accept an assumed infiltration rate. Methods for calculating infiltration rates are addressed in the DOE stormwater manual. [062624 PRELIM STORM REPORT - R-SSP-2024-06-25 - RESUB, Page 38/547]*

**Response:** Field work to determine accurate infiltration data has been delayed due to difficulty obtaining permits. The field information from the geotechnical consultant will be submitted for review as soon as available.

38. *FIFE COMMENT: More discussion needed with Puyallup Tribe et al around discharging into the Oxbow. [062624 PRELIM STORM REPORT - R-SSP-2024-06--25 - RESUB, Page 34/547]*

**Response:** The current plans use an alternate storm discharge route which does not contribute to the oxbow.

39. *FIFE COMMENT: THIS NEEDS TO BE DISCUSSED AND CLARIFIED. [062624 PRELIM STORM REPORT - R-SSP-2024-06-25 - RESUB, Page 182/547]*

**Response:** The previous design included a stormwater mitigation trade near the north end of the site. Due to full depth pavement replacement used with the current design, all runoff is now collected and mitigated. This section of the report has been revised.

40. *FIFE COMMENT: You need to show the pavement on 48th St and how you'll be addressing the stormwater runoff for that road. [062624 PRELIM STORM REPORT - R-SSP-2024-06-25, Page 195/547]*

**Response:** 48<sup>th</sup> Street is no longer being used for utilities. Improvements to this road are not proposed.

41. *FIFE COMMENT: You're not showing the 48th St basin. [062624 PRELIM STORM REPORT - R-SSP-2024-06-25 - RESUB, Page 198/547]*

**Response:** Improvements to this road are no longer proposed. This road is not part of the project drainage basin.

42. *FIFE COMMENT: Please explain how this will be existing asphalt when it's planned to be replaced? [062624 PRELIM STORM REPORT - R-SSP-2024-06-25 - RESUB, Page 199/547]*

**Response:** In the prior submittal, the highlighted surface was not "replaced impervious" since it was shown to be grind/overlay. In the current submittal, this surface is 100% new and no longer able to be used for a mitigation trade.

43. *FIFE COMMENT: THIS PLAN SET IS OUT OF DATE AND DOESN'T REFLECT THE MOST RECENT SUBMITTAL. [062624 PRELIM STORM REPORT - R-SSP-2024-06-25 - RESUB, Page 377/547]*

**Response:** Noted. The report has been revised to use current plan sheets.

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

Freeman Rd/Levee Rd Intersection:

44. *Provide detailed responses to KPG's traffic engineering memos (6/24/2024, 8/15/2024)*

**Response:** See included Kimley Horn memo.

45. *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. Update Autoturn analysis accordingly.*

**Response:** See included Kimley Horn memo.

46. *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:** See included Kimley Horn memo.

Freeman Rd:

47. *On the south end of the project frontage, the proposed 200amp service cabinet is within the sight triangle for the adjacent driveway (existing and future edge of roadway).*

**Response:** This item to be resolved during civil permit.

48. *At all driveway locations update sight distance exhibits with correct setback from face of curb (driver eye setback needs to assume 18ft from face of curb). For both directions, assume future offset of face of curb for analysis. Place note on places of where vegetation must be removed by the applicant to meet sight distance requirements.*

**Response:** Sight distance exhibits have been updated as requested.

49. *Update Autoturn analysis with updated roadway width (three 12ft lanes per Fife standards).*

**Response:** See Civil Sheets 40-44 for Site Circulation and turning movement details.

50. *Civil submittal shall provide detailed taper calculations for CL and fog line (north & south taper locations). Provide all variables used to calculate taper. Fog line appears to be missing from channelization design. Fife standard details for striping not included.*

**Response:** To be provided during civil permit submittal.

22nd Ave NW

51. *Install "No truck" signage for the mid-block commercial driveways. Driveway dimensions are acceptable and will be verified during civil review.*

**Response:** To be evaluated during civil submittal.

52. *It is acceptable to have wider than 30ft driveway within the cul-de-sac to accommodate WB-67 truck movements.*

**Response:** Noted.

53. *Proposed pavement markings and striping do not meet City of Puyallup standards. Please review left turn pocket striping standards for the City of Puyallup. Please review TWLTL striping standards for the City of Puyallup. The TWLTL striping will taper to CL approaching the cul-de-sac (no striping within cul-de-sac). Standard details not provided.*

**Response:** Striping revised. Striping to be fully designed during preparation of construction drawings.

54. *Include COP standard detail for STOP sign and bar. Remove thermoplastic "STOP" text for WB approach.*

**Response:** STOP thermoplastic removed. Standard details to be addressed during preparation of construction drawings.

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

**Response:** Noted.

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

**Response:** Noted. To be revised during civil submittal.

48th St E

44. *Coordinate with Greg Vigoren (City of Fife) to determine the extent of roadway improvements.*

**Response:** Current proposal does not include utilities in 48<sup>th</sup> Street East. No road improvements are proposed on this street.

We believe that the above responses, together with the enclosed revised plans and technical documents, address all of the comments in your letter dated August 22, 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,



Cheryl Ebsworth  
Senior Planner

CE/kb



Chris Beale  
City of Puyallup  
Planning Division

-17-

December 23, 2024

21585c.006.docx  
enc: As Noted  
cc:

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