



July 16, 2025

City of Puyallup  
Development and Permitting Services  
333 S Meridian  
Puyallup, WA 98371

City of Fife  
Community Development  
5411 23<sup>rd</sup> St E  
Fife WA 98424

RE: Responses to SEPA Co-Lead Agencies Comments  
Freeman Road Logistics  
4723 Freeman Road E, Puyallup, Washington 98371  
City File No. P-21-0136  
Our Project No. 21585

The following outline provides each of your comments in italics exactly as written in your March 19<sup>th</sup> letter, along with a narrative response describing how each comment was addressed:

**SEPA Determination of Significance (DS) status**

***Transportation:***

- *City of Puyallup and Fife staff (KPG Psomas representing Fife's traffic review) completed a review of the updated October 21, 2024 technical memo on the Freeman Road E/N Levee Road E intersection (Kimley-Horn) and additional transportation information found in the resubmitted Civil drawing set dated December 20, 2024. KPG/Psomas and Puyallup staff reviewed the May 23, 2024 Kimley-Horn memorandum and provided review comments in a memorandum dated August 14, 2024. The June 2024 Traffic Impact Analysis (TIA) has not been updated. The revised October 21, 2024 memorandum did not address many of the comments provided by KPG/Psomas and Puyallup staff. The previous comments from the August 14, 2024 review memorandum have not been addressed.*

**Response:** A July 2025 TIA is provided which updates the project analysis and description based on all reviewing agency comments and follow up meetings. All comments have been addressed and the project modified as directed by the cities.

- *Please see the updated review memo from KPG and Puyallup staff (dated 02/04/25). In that memo, you will see direct guidance regarding the requirement for intersection improvements at Levee Road and Freeman Road, which has remained unchanged and has not yet been addressed.*

*"The City of Fife's and the City of Puyallup's preferred improvement for the Freeman Road E/N Levee Road E intersection is a southbound left turn lane, southbound right turn lane, eastbound left turn lane, an eastbound receiving/acceleration lane for the southbound left turn lane, and maintaining*

*stop control only for southbound Freeman Road E. This alternative results in LOS D or better for all land use alternatives. This improvement maintains traffic flows on N Levee Road E and provides a two-stage left turn for vehicles from southbound Freeman Road E. (...). Please provide a conceptual design for this alternative. Include analysis of adequate sight distance for southbound Freeman Road E. Show the sight distance triangle and relationship to the right of way line on the north side of N Levee Road E."*

- *A new design is necessary to proceed with the project, consistent with the guidance above. If existing ROW is not available or obtainable by the applicant to accommodate the necessary improvements, it is probable that a Significant Adverse Unavoidable Impact would occur, requiring study of the issue in an EIS.*

**Response:** Kimley-Horn has provided an April 10, 2025 memo to provide specific responses to the cited February 4, 2025 comments.

The project is proposing a new intersection design which is consistent with the cities' guidance and sufficiently mitigates project impacts. The requirement to acquire the necessary right-of-way should be imposed as a SEPA mitigation condition, with the right-of-way to be acquired by the applicant or by the City of Fife via its condemnation authority, as this is a capital improvement that will benefit the entire surrounding area. Additional analysis is included in the July 2025 TIA.

***Utility routing:***

- *The updated application indicates utilities (domestic water, sanitary sewer and stormwater) would be routed through public ROW (south on Freeman Road and east on Levee Road) to connect with existing public utilities in Puyallup.*

**Response:** The proposed utility routing for the project involves connecting to existing lines located at or near the intersection of Industrial Parkway & N Levee Road E, extending west within N Levee Road E for approximately 2,300 feet to the intersection with Freeman Road E, then extending north within Freeman Road E to the project site, between 750 and 1,800 feet north of N Levee Road, depending on the point of connection to the project. The primary route includes water, sanitary sewer, storm sewer and natural gas utility extensions. Pierce County has approved this proposal.

The City of Fife requested the project also evaluate an alternative utility connection to existing lines within 48<sup>th</sup> Street E to the west of the development. Sanitary sewer would require approximately 1,750 feet extension east on 48<sup>th</sup> Street E to reach Freeman Road E, then extension south for approximately 550 feet to reach the southern of two proposed buildings. Water would entail approximately 1,830 foot extension to reach Freeman Road E, then north or south on Freeman Road E at the discretion of the city. Storm sewer and gas utilities would be required to follow the primary utility route as they are not available on 48<sup>th</sup> Street E. The SEPA checklist has been updated to evaluate this alternative connection.

If the cities of Fife and Puyallup take appropriate legislative action to allow utilities in 48<sup>th</sup> Street SE to serve properties within Fife City limits, and Fife constructs those utilities at its sole cost, the applicant will not object, provided the alternative connection does not adversely impact construction schedule and does not increase the applicant's project costs. Alternatively, the applicant could elect to install utilities in 48<sup>th</sup> Street SE at its cost at its sole and absolute discretion.

- *Pierce County has not supplied preliminary acceptance of placement of utilities in the Puyallup River levee. City staff reached back out to Pierce County staff (Brandon Smith) in late-February.*

**Response:** On April 21, 2025 Brandon Smith as the Assistant County Engineer – Stormwater confirmed with Ken Cook that PPW is willing to allow the City of Puyallup to extend public infrastructure in the Levee Road.

***For SEPA purposes, we need to ensure:***

- *Placement of new utilities in these ROW alignments do not preclude Fife from also placing utility services without forcing Fife to violate separation standards, in Fife ROW (Freeman Road).*

**Response:** Noted. The improvements in Freeman Road are proposed to City standards or approved alternatives to best meet the intent of the code and the unique site constraints of the area. That will continue to be the case for future work within the right of way and this project does not preclude those efforts from being successful.

- *Pierce County is satisfied that appropriate easements are available and that placement of new utilities in the river levee (Levee Road) will not decrease the level of safety provided by the levee system in this area.*

**Response:** Noted, we understand this has been resolved.

- *Placement of public utilities to serve the site will not create a gift of public funds and/or place an undue burden on the public to maintain long term.*

**Response:** Noted, the property is within the service area for public utilities and connection has therefore been planned for and been appropriately anticipated. The applicant is open to discussing a maintenance agreement, if requested by the City of Puyallup.

- *Ensure that capacity exists in the downstream sanitary and storm systems to allow discharge to these public mains.*

**Response:** Noted, the capacity analysis for the downstream infrastructure is included in the Stormwater Site Plan Section 4 – Off-Site Analysis. Downstream flows from the project do not exceed the conveyance capacity of the existing city-maintained system on Levee Road.

The applicant has not received any indication from the City that there is a sewer capacity issue. Warehouse uses are not high sewer capacity generating users. We anticipate that site development and building permit review will ensure adequate capacity.

- *Fife's water and sewer system remain available for extension to the site with an expansion of the service boundaries. It is not entirely clear why; besides timing, this has not been further analyzed. The lineal footage of improvements is half that of the Levee Rd option. The applicant could also potentially recoup costs through a latecomer agreement, which does not realistically exist with connection to Puyallup utilities.*

**Response:** Noted. It is not common to alter utility service areas if service can be provided, the project has therefore focused on obtaining service from the current service provider. We understand that service area boundaries are reviewed as part of the comprehensive planning of each jurisdiction and potential future connections are anticipated to support the utility system

both financially and functionally via new investments, design volumes and pressures. So, revising those boundaries is not something individual property owners pursue without an indication from the utilities that it is feasible for both systems, and that the current provider cannot provide service.

If the cities of Fife and Puyallup take appropriate legislative action to allow utilities in 48<sup>th</sup> Street SE to serve properties within Fife City limits, and Fife constructs those utilities at its sole cost, the applicant will not object, provided the alternative connection does not adversely impact construction schedule and does not increase the applicant's project costs. Alternatively, the applicant could elect to install utilities in 48<sup>th</sup> Street SE at its cost at its sole and absolute discretion.

***Tribal coordination:***

- *Fife and Puyallup staff reached out to the Puyallup Tribe staff to review the most recent submittal documents. As you are aware, the proposed project is within the Puyallup Tribe's reservation boundaries. Per the Puyallup Tribe of Indians Land Claims Settlement of 1990, the Cities of Fife and Puyallup have a responsibility to consult with the Tribe on all major projects within the 1873 Survey Area, in which this project qualifies as one. Additionally, the site plan identifies improvements on Tribal property which are subject to TEPA standards and regulatory review by the Tribe. Delineating that jurisdiction between the Cities of Fife and Puyallup and the Tribe is part of the joint regulatory authority and it is collectively of the City of Fife, Puyallup, and the Tribe's job to coordinate where SEPA and TEPA jurisdiction exists.*

**Response:** Noted, no comments on the site plan have been received. No work is proposed on tribal property.

- *Concerns remain regarding temporary construction/slope encroachment and the possibilities of necessary construction related easements for the PTOI property (NE corner of Levee and Freeman) and tribal lands held in trust near the project site.*

**Response:** The intersection improvements at Levee and Freeman have been revised and no temporary construction/slope encroachment is needed. Further, no construction related easement is needed for the PTOI property.

- *Concerns regarding water quality related to discharge of 6PPD water pollutants remain.*

**Response:** This is the first comment we have seen related to the discharge of 6PPD. Please see the Anchor QEA memo dated June 11, 2025 addressing stormwater design and water quality measures related to this pollutant.

***Noise:***

- *Noise analysis must be conducted to conclude in SEPA that no significant adverse impacts will occur in relation to noise from on-site operations (truck idling, truck movements, loading door operations and HVAC equipment are central issues to be studied). The joint agencies propose to conduct the study using a consultant, administered through a pay agreement with you (similar to the Mitigation Banking Instrument (wetland credits) consistency study).*

**Response:** The applicant has entered into an agreement to pay for this analysis and based on the Landau draft report, no significant adverse impacts from noise are anticipated from this project. The City of Puyallup and Landau are working to finalize the Noise Study.

We believe that the above responses, together with the balance of resubmitted items for the Preliminary Site Plan including revised plans and technical documents, address all the comments in the Co-Lead Agency letter dated March 19, 2025. 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

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enc: As Noted  
cc: