



BARGHAUSEN
A DIVISION OF CORE STATES GROUP

**CORE
STATES**

July 16, 2025

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 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 March 19, 2025. Enclosed are the following documents for your review and approval:

1. Civil Plans by Barghausen Consulting Engineers dated July 16, 2025
2. Response Memo by Kimley Horn dated April 10, 2025
3. Email Comment Clarification by Chris Beale dated April 8, 2025
4. Infiltration testing Memo by Terra Associates dated February 20, 2025
5. Off-site Groundwater Memo by Terra Associates dated May 31, 2025
6. Frontage Infiltration Rate Memo by Terra Associates dated April 25, 2025
7. Response to SEPA comments- Stormwater Design and Water Quality Measures for 6PPD Removal by Anchor QEA dated June 11, 2025
8. Traffic Impact Analysis (TIA) by Kimley Horn dated July 2025
9. Preliminary Stormwater Site Plan by Barghausen Consulting Engineers dated July 14, 2025
10. Response to Co-Lead Agency SEPA status letter by Barghausen Consulting Engineers dated July 16, 2025
11. Architectural Site Plan by Synthesis Architecture dated July 2, 2025
12. LED Streetlight-J series specification data sheet by LeoTek
13. Illumination Plans by Herman Traffic Engineering, INC dated July 8, 2025

BARGHAUSEN CONSULTING ENGINEERS, LLC

A DIVISION OF CORE STATES GROUP

18215 72ND AVENUE SOUTH, KENT, WA 98032 P) 425.251.6222 F) 425.251.8782

barghausen.com

14. Illumination calcs by Herman Traffic Engineering, INC dated July 8, 2025

15. SEPA Checklist by Barghausen Consulting Engineers dated July 18, 2025

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

Corrections

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

1. *FIFE COMMENT: USE C CURB INSTEAD OF TRAFFIC CURB. [062624 PRELIM CIVIL-2024-06-25- RESUB, Sheet C27]*

Response: C curb shown on Sheet C26 of the revised civil plans.

2. *FIFE COMMENT: Gravity storm facilities within the City of Fife will be owned and maintained by CoF and constructed per CoF approvals and standards. Drainage permits will be required for design review. [CIVIL-SEPA-2024 RESUB, Sheet C8]*

Response: Comment acknowledged. City of Fife standards used for preliminary design of Freeman Road.

3. *FIFE COMMENT - Remove or strike out note 14. The water shall be from City of Puyallup. [CIVIL-SEPA-2024 RESUB, Sheet C20]*

Response: Note 14 removed from the revised civil plans.

4. *FIFE COMMENT: City of Fife grading permit required for design review. Also, require a Street Opening Permit and ROW Permit for review and approval. [CIVIL-SEPA-2024 RESUB, Sheet C20]*

Response: Comment acknowledged. The Street Opening Permit and ROW Permit design will be reviewed to City standards.

5. *FIFE NOTE: RIGHT OF WAY DEDICATION REQUIRED PRIOR TO PERMITTING. [CIVIL-SEPA-2024RESUB, Sheet C21]*

Response: Comment acknowledged. Right of way dedication will be completed prior to permitting. The applicant is coordinating with the property owner for dedication.

6. *FIFE NOTE: Show seasonal groundwater elevations in relation to proposed infiltration trench elevations. [CIVIL-SEPA-2024 RESUB, Sheet C21]*

Response: Seasonal groundwater elevations annotated on the revised civil plans.

7. *FIFE COMMENT: Enhance cross section and clearly illustrate how future Fife utilities (sewer and water) will have adequate space for standard installation. Also show all existing and proposed crossings in profile. [CIVIL-SEPA-2024 RESUB, Sheet C21]*

Response: Cross section has been revised to reflect additional spacing of proposed utilities. Crossings shown in profile where applicable.

8. *FIFE COMMENT: We're not accepting the all way stop option at Freeman Rd and N Levee Rd. Further mitigation efforts need to be considered and pursued. [CIVIL-SEPA-2024RESUB, Sheet C28]*

Response: The intersection improvements have been revised to over mitigate this intersection improvement. These improvements were discussed in follow up meetings with the City of Fife and the City of Puyallup and no longer includes an all-way stop. We understand the current proposed configuration is something both cities can support, based on the meetings held 4/10/2025 and 5/13/2025. See KPG memo dated April 10, 2025 and TIA dated June 2025

9. *FIFE COMMENT: Add Radii labels. [CIVIL-SEPA-2024 RESUB, Sheet C31]*

Response: Radii labels added to the revised civil plans.

10. *FIFE COMMENT: Need signage warning drivers lanes heading north will be reduced. [CIVIL-SEPA-2024 RESUB, Sheet C31]*

Response: Additional signage added to the revised civil plans.

11. *FIFE COMMENT: Signage needed to prevent semi trucks going west on 48th St E (prohibited). [CIVIL-SEPA-2024 RESUB, Sheet C40]*

Response: Additional signage added to the revised civil plans.

12. *FIFE COMMENT: Left turn only signage. [CIVIL-SEPA-2024 RESUB, Sheet C40]*

Response: Additional signage added to the revised civil plans.

13. *Ensure all North arrows are orientated correctly. [CIVIL-SEPA-2024 RESUB, Sheet C41]*

Response: North arrows corrected on the revised civil plans.

City of Puyallup Notes for 5th Submittal:

1. *This submittal was the first look at a new utility alignment that requires a relatively sophisticated level of coordination between departments, the two cities, the County and others. As such, the review took longer than usual and cannot be approved at this time. Unknowns that affect feasibility are still being considered and are not able to be resolved at this time. They include:*

- *County permission and preference (The County has indicated that they will have time to look at this in March): While the annexation created legal city right of way, the levee itself is managed by the county and coordinated review should be expected.*

Response: Comment acknowledged. The County has now provided input on this and has indicated that Planning & Public Works (PPW) will enter into an agreement with City of Puyallup for the City to extend public infrastructure within Levee Road.

- *Capacity of the downstream storm infrastructure, and whether or not a direct discharge to the Puyallup River could be achieved: The City believes that this design may qualify as a direct discharge and as such would have a Flow Control Exemption from Minimum Requirement #7 which could alter the storm design significantly. Should the applicant pursue this option it shall be clearly shown that the design adheres to the 2019 SW Manual requirements for a direct discharge/flow exemption. In either scenario a downstream capacity analysis of the existing receiving infrastructure is requested to be submitted for review during the next submittal. This will inform the feasibility of the storm design. If the existing infrastructure cannot accommodate the design storm, then portions of the existing system shall be upgraded or an alternative design submitted.*

Response: The project appears to qualify for direct discharge to the Puyallup River since all proposed and existing conveyance elements between the project and the receiving water are man-made. The existing storm infrastructure in Levee Road may not currently have capacity for a non-flow-controlled design. Such a design would result in the Freeman Logistics project transmitting upwards of 20 cfs of stormwater into the downstream system during a 100-year return storm. Significant over-topping of the existing storm structures are predicted in this case. Conveyance capacity improvements would be required along the Levee Road system to support such a design.

We recognize that there may be some capacity in the downstream system which would allow the Freeman Logistics development to decrease proposed onsite detention volumes in exchange for increased discharge rates to Levee Road. This will be verified with civil permit review prior to permit approval. Water quality mitigation would remain unchanged (Enhanced treatment provided for all target runoff). We reserve the right to further the design during final engineering, to determine necessary detention volumes.

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.

- *Can the city accept public lift stations that are on private property and only serve one development with limited expansion potential, or should these stations be privately owned and maintained? City Operations Staff have voiced concerns about disproportional city resources required to maintain this infrastructure versus the benefit.*

Response: Vector is accepting of whichever ownership option is preferred by Puyallup. Vector can own/maintain the lift station and then the city takes ownership of the force main located within the right of way.

2. *For sewer, our Operations Crew have asked if an onsite holding tank could be considered. With the low volume of sewage generated by these facilities and the considerable cost of installing and maintaining a pump station and encased FM system, this could be a workable solution. Several other industrial sites in the city have septic style tanks that are pumped (no drainfield) on a regular basis.*

Response: The applicant does not want to use the option for a septic tank or pump system.

3. *Mixing of public stormwater from two different jurisdictions and placing Puyallup utilities in Fife's ROW will require coordination at all stages and an Inter Local Agreement between the two cities. This should be a high priority early in the civil design review process.*

Response: Comment acknowledged. This will be addressed during the civil permitting process.

4. *Our Operations Crew have also asked if it would be possible to explore infiltration capacity in front of the proposed buildings in Freeman Rd to explore whether or not infiltration facilities could be placed in the road similar to how it is proposed farther to the south reducing the amount of stormwater treatment and detention in the ROWs.*

Response: Per the original geotechnical report and supplemental memo provided by Terra Associates Inc., onsite infiltration capacity is limited by the composition of the native soils. Infiltration in this location was explored and determined not feasible.

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

1. *Freeman Rd/Levee Rd Intersection:*

-Provide detailed responses to KPG's latest traffic engineering memo dated 2/4/2025. The City has requested and not received responses from KPG's previous (2) comment letters: (6/24/2024, 8/15/2024).

Response: Responses to the February 4, 2025 memo have been provided in an April 10, 2025 memo included with this submittal. The revised TIA incorporate all comments received and input in follow up meetings held with each agency.

-Per previous comments, 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. With these improvements, this intersection will operate within Fife LOS standards.

Response: The revised intersection includes these elements, see the revised civil plans.

-All-way STOP at Levee/Freeman is not supported by the City of Puyallup. Volumes do not warrant all-way STOP control.

Response: Noted. The all-way stop is no longer proposed.

-The updated Autoturn analysis at this intersection shows vehicle encroachment into adjacent vehicle paths. Re-run Autoturn analysis showing intersection improvements listed above (roadway widening, turn pockets, etc.)

Response: Truck turn movement analysis has been revised per the updated intersection layout. The vehicle encroachment into adjacent vehicle paths, has been resolved.

-Sight distance analysis not provided for this intersection. Analysis needs to assume EB/WB free movements, roadway widening, etc. Address all comments related to sight distance provided in KPG's latest traffic engineering memo (2/4/2025) Freeman Rd:

Response: Sight distance analysis has been provided for the updated intersection. See Kimley Horn's April 10th response letter for comments related to KPG's 2/4/25 memo.

-Place note on plans that identify locations where vegetation must be removed by the applicant to meet sight distance requirements. The City of Puyallup will condition occupancy of buildings until adequate sight distance has been verified at the northern driveway.

Response: Additional annotations have been added to the civil plans as necessary.

-At the northern most driveway, the updated Autoturn analysis shows vehicle encroachment into adjacent travel paths.

Response: Updated Autoturn analysis is provided see sheet C44 of the revised Civil Plans.

-Please coordinate with the City of Fife regarding the latest design proposal for (2) USPS direct drop-off areas along Freeman Rd frontage. It's my understanding this proposal does not meet City of Fife frontage design standards. For this Arterial segment (Freeman Rd), in-bound/out-bound vehicle movements should occur at proposed commercial entrances. For safety and continuity, continuous curb along this arterial segment is recommended.

Response: USPS service will be provided on private property. The previous turn-outs are removed from the site plan.

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

1. UPDATED PLANNING REVIEW NOTES MARCH, 2025:

See the included SEPA letter from the Responsible Officials at each of the co-lead agencies (Fife and Puyallup). The letter discusses outstanding issues related to the SEPA review for the project, including roadway improvements (particularly at Levee and Freeman Road), traffic impact analysis, utility routing, utility capacity, Tribal coordination and noise study. Confluence is conducting the necessary analysis of the Port of Tacoma Mitigation Bank credit purchase of the critical areas impacts.

Response: See the separate response to the SEPA letter from the Responsible Officials.

On April 25, 2025 the City issued the Confluence analysis of the Port of Tacoma Mitigation Bank credit purchase which recommended approval and we understand the City agrees.

2. (previous) PLANNING REVIEW NOTES AUGUST, 2024:

UPDATED PLANNING REVIEW NOTES AUGUST, 2024:

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

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, please see civil plans for limited frontage area where walls are excluded to comply with flood modeling. The above landscaping will be provided along both building frontages along Freeman Road, and we understand this meets the condition list item below.

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: This has been resolved by the prior submittal, and Chris Beale confirmed this is an outdated comment, see April 8, 2025 email.

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: Alternative utility routing has been proposed to avoid any encroachment on the Schenk properties.

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

Response: Chris Beale confirmed this is an outdated comment, Chris Beale confirmed this is an outdated comment, see April 8, 2025 email included with this submittal.

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, each comment is responded to within this letter.

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.

Response: The design for the site has been modified to avoid the tribal lands/properties. Easements and access are no longer needed from the tribe.

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: Noted, issues related to the improvement design are resolved and Shoreline Substantial Development Permits will be obtained prior to civil permit approval.

Corrections

Standard Conditions

60 days prior to discharging any runoff from the site a Construction Stormwater General Permit must be applied for with the Washington State Department of Ecology.

Response: Comment acknowledged. CSGP application will be completed with the DOE.

Submit With Civil Permit Application

Boundary Line Adjustment required between cities once dedication and ROW construction are complete. City boundary shall be at new Right Of Way.

Response: Acknowledged.

Standard Conditions

-Traffic Impact fees (TIF) will be assessed in accordance with fees adopted by ordinance, per PMC 21.10. Impact fees are subject to change and are adopted by ordinance. The applicant shall pay the proportionate impact fees adopted at the time of building permit application

Response: The applicant will pay the required (TIF) fees, and intends to elect deferral of payment prior to certificate of occupancy as described in Puyallup Municipal Code 21.20.020 (5).

-Park impact fee was established by Ordinance 3142 dated July 3, 2017 and shall be charged \$0.87 per sq ft of building space.

Response: Noted.

-Per Puyallup Municipal Code Section 11.08.135, the applicant/owner would be expected to construct half-street improvements including curb, gutter, planter strip, sidewalk, roadway base, pavement, and street lighting. Any existing improvements which are damaged now or during construction, or which do not meet current City Standards, shall be replaced.

Response: Noted.

-As part of these improvements, additional right-of-way (ROW) may need to be dedicated to the City.

Response: Noted.

-Coordination with Union Pacific regarding potential at-grade rail crossing improvements. Such improvements may include:

Roadway widening, grade-separation, advanced pre-emption, queue detection, pre-signal, increased queue storage, health circuit, supervision circuit, etc

Response:

See section 11 of the TIA for Union Pacific Railroad Crossing analysis which states that under current conditions the project is not expected to add length to northbound queues during the Critical AM Peak Hour. Planned improvements by WSDOT are expected to reduce traffic further. This project is not triggering rail crossing improvements and an existing WSDOT project is completing this work as part of a planned project. Based on the TIA analysis there is no impact expected from occupancy of this project prior to the WSDOT crossing improvement completion.

The applicant has reached out to Union Pacific Railroad (UPRR) on the pre-emption hardware and software. UPRR has indicated they are working with WSDOT on this crossing, their preference is to coordinate with WSDOT based on other Freeman Road improvements being completed by WSDOT.

-Any required improvements must meet Union Pacific design requirements.

Response: Noted.

-The City of Puyallup will condition occupancy of buildings until adequate sight distance has been verified at the northern driveway.

Response: Noted.

-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 service cabinet has been moved to avoid the sight triangle, see revised civil plans.

-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. Five standard details for striping not included.

Response: Noted the future civil permit submittal will include the detailed taper calculations with the channelization design.

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

Response: Noted on the driveway dimensions and "No truck" signage is provided for the mid-block commercial driveways along 22nd Avenue Northwest.

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

Response: Noted.

-Streetlight design will be reviewed during Civil permit submittal.

Response: Noted. Streetlight design will be included with Civil permit.

-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. The proposed J series specification data sheets have been included with this resubmittal.

Submit With Civil Permit Application

At the time of civil permit, the applicant shall provide a grading and landscape plan for the site frontage that shows a 6' tall slope, with 6' back wall, and a 6' tall wood fence atop the back of the sloped berm, consistent with the Type 1d standard in the city's VMS standards manual. All plant material size and density shall meet the various applicable sections of the VMS.

Response: Noted, please see civil plans for limited frontage area where walls are excluded to comply with flood modeling. The above landscaping will be provided along both building frontages along Freeman Road, and we understand this meets the condition.

The applicant will need to prove appropriate legal rights/access are provided by PTI and/or BIA to allow any impacts to those affected tribal lands/properties near the development and any off-site roadway, off-site sight distance (Levee/Freeman), storm water discharge, temp construction and/or utility improvements. The applicant will also need to provide proof of PTI approval to the off-site downstream oxbow (Fife) wetland. PTI permits are known to be required to discharge storm water onto PTI owned lands downstream. The Levee Road/Freeman Road intersection improvements are known to require various easements and potentially other approvals from PTI government.

Response: The design for the site has been modified to avoid the tribal lands/properties. easements are no longer needed from the tribe.

Submit With Building Permit Application

Vehicle charging stations will be required with new parking under the 2021 Washington Building Codes (WAC 51-50-0429). Please review these standards for parking and additions as applicable.

Chris Beale
City of Puyallup
Planning Division

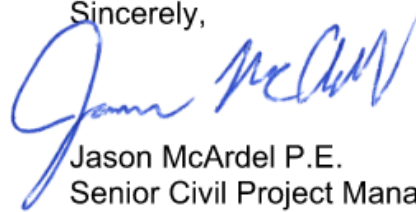
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July 16, 2025

Response: Noted.

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 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,



Jason McArdel P.E.
Senior Civil Project Manager

CE/kb
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enc: As Noted
cc: