



City of Puyallup

Planning Division

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STAFF MEMO TO HEARING EXAMINER

To: Hearing Examiner

From: Rachael N. Brown, Associate Planner

RE: South Hill Business & Technology Center Project # PLBSP20230028

Date of memo: March 05, 2026

Hearing Date: March 04, 2026

PROJECT OVERVIEW	
<p>Applicant: Kali Barnes</p> <p>Staff Coordinator: Rachael N. Brown</p> <p>Property Owner: BCC PUYALLUP LLC</p> <p>Address: 1019 39TH AVE SE, PUYALLUP, WA 98374; 1021 39TH AVE SE, PUYALLUP, WA 98374; 1015 39TH AVE SE, PUYALLUP, WA 98374;</p> <p>Parcel ID#: 0419034036; 0419034038</p> <p>Site Size: 3,122,703.00</p> <p>Comp Plan Designation: B/IP (Now ME)</p> <p>Zoning: MP</p>	<p>Proposal: Create 8 Binding Site Plat lots with existing improvements to remain. No new structures are proposed.</p> <p>Staff Recommendation: APPROVE WITH CONDITIONS</p>

SUPPLEMENTAL MEMO TO STAFF REPORT

This memo supplements the Staff Report dated February 25, 2026 and explains how the proposed Binding Site Plan was reviewed for compliance with Puyallup Municipal Code (PMC) Chapter 19.12 – Design Principles, Standards and Specifications and the Comprehensive Plan. The City of Puyallup Development Review Team (DRT) conducted interdisciplinary review including Planning, Development Engineering, and Traffic Engineering staff. Review occurred through several rounds of correction letters and applicant responses.

Because the proposal creates additional vacant lots and adjusts the lot lines around existing development and does not include a proposal for new construction, the review focused on ensuring

the proposed lot configuration preserves environmental protections, infrastructure, access, and circulation systems consistent with PMC Chapter 19.12.

PROJECT DETAILS

Create 8 Binding Site Plat lots from 2 existing lots, with existing improvements to remain. No new structures are proposed.

The proposed lots and tracts have the following proposed uses:

LOT 1:	VACANT
LOT 2:	OFFICE BUILDING
LOT 3:	OFFICE BUILDING
LOT 4:	VACANT
LOT 5:	VACANT
LOT 6:	VACANT
LOT 7:	VACANT
LOT 8:	STORM POND
TRACT A:	WETLAND
TRACT B:	WETLAND

STAFF CONCLUSIONS

Section I – PMC 19.12

A. Critical Areas and Environmental Conditions (PMC 19.12.030)

Finding: The proposal addresses applicable environmental conditions and critical areas consistent with City regulations.

Discussion: The binding site plan delineates wetlands and preserves those which are locally regulated wetlands and their buffers within dedicated tracts. Plat notes reference applicable wetland and fish and wildlife habitat protection requirements (Ex. 1; Ex. 25; Ex. 26; Ex. 27; Ex. 28). The proposal does propose development within the wetlands or required buffers.

Environmental review also identified subsurface contamination with potential vapor intrusion concerns associated with historical site uses. A note was added to Sheet 4 identifying potential vapor intrusion risks related to chlorinated solvent contamination and requiring a Tier 2 investigation for sensitive uses within approximately 100 feet of affected buildings (Ex. 1; Ex. 29; Ex. 30).

Conclusion: Standard Met.

B. Utilities – Drainage Facilities (PMC 19.12.060(1))

Finding: The proposal provides for adequate utilities and shared stormwater infrastructure consistent with City requirements.

Discussion: The site is currently served by public utilities including water, sanitary sewer, and stormwater facilities. The binding site plan includes notes to address maintenance of existing and future water systems

across the properties. The binding site plan also includes reciprocal stormwater easements across the newly created lots to ensure continued conveyance and maintenance access for the existing stormwater system following division of the property (Ex. 25; Ex. 26).

Conclusion: Standard Met.

C. Transportation Facilities (PMC 19.12.050)

Finding: The proposal provides coordinated internal circulation and access, including vehicle and pedestrian circulation within the site that meets City standards.

Discussion: The site is previously developed with existing internal private roadway, drive aisles, and parking areas providing circulation throughout the development. The binding site plan maintains these internal circulation areas and includes shared access easements across private roads, sidewalks, parking areas, and circulation routes to ensure continued access between lots (Ex. 1, Sheet 1). Access to the site is provided from 39th Avenue SE. The binding site plan also includes a future access easement allowing potential realignment of the eastern driveway onto 39th Avenue SE to meet City driveway spacing standards (Ex. 1; Ex. 12).

Staff reviewed pedestrian circulation within the site pursuant to PMC 19.12.050(2). Consistent with PMC 19.12.050(2)(e), which requires pedestrian connections through blocks exceeding 600 feet in length, the City required an internal pedestrian easement and trail across the site to provide connectivity between activity areas.

During review, the pedestrian crossing associated with this trail was relocated to improve sight distance, and the plans were revised to include a paved pedestrian pathway and MUTCD-compliant signage. (Ex. 1; Ex. 31; Ex. 32).

Conclusion: Standard Met.

A. Block and Lot Layout – Lot Arrangements (PMC 19.12.060)

Finding: The proposed lot configuration provides access to all lots and does not create nonconforming development conditions.

Discussion: The binding site plan adjusts the lot lines of the existing individual lots around 2 of the existing buildings (proposed lots 2 & 3) on the site and creates 6 new lots. The existing private roadways provide sufficient access to the new and existing lots. The proposal maintains shared circulation areas and infrastructure. Measurements provided on the binding site plan confirm that the distance between existing buildings and proposed lot lines maintains compliance with applicable development standards (Ex. 1; Ex. 25).

The plan includes non-exclusive access easements across internal private roads, parking areas, and circulation routes to ensure each lot maintains public access to 39th Avenue SE (Ex.1; Ex. 32). As noted previously, the plan also includes a future access easement allowing potential realignment of the eastern driveway onto 39th Avenue SE to meet City spacing standards (Ex. 1; Ex. 12).

Conclusion: Standard Met.

Section 2 – Comprehensive Plan Consistency - Puyallup Comprehensive Plan 2044

Finding: The proposal implements goals and policies of the Puyallup Comprehensive Plan (2044), including the Land Use Element, Economic Development Element, Natural Environment Element, and the South Hill Neighborhood Plan.

The Comprehensive Plan Future Land Use designation for the site is Mixed Employment (ME). The property is zoned MP – Business Park, which implements employment-oriented uses such as office, commercial, and light industrial development consistent with the Mixed Employment designation.

Note: The Mixed Employment designation was previously named Business/Industrial Park (B/IP) and was renamed during adoption of the Comprehensive Plan 2044.

A. Land Use Element

The following policies from the Land Use Element apply to the proposal:

- **LU-1:** “Provide a mix of land uses that meets housing and employment targets while supporting a compact built environment that promotes walking, biking, and using transit to access goods, services, education, employment, and recreation.”
- **LU-1.2:** “Designate and zone lands for employment to accommodate the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses.”
- **LU-1.8:** “Prioritize capital investments that support development and investment in areas that are underserved in terms of infrastructure or services and in areas that have not met expectations for redevelopment.”
- **LU-14.4:** “Promote high quality business, research, and light manufacturing developments in business/industrial parks through site design, landscape, and architectural standards.”
- **LU-14.7:** “Allow and encourage ancillary retail and personal services, walking trails and open space to support industrial businesses and employees. Limit commercial uses that are not supportive of or incidental to industrial uses.”

Discussion: The subject property is designated Mixed Employment (previously B/IP) and is zoned MP – Business Park, which supports employment-generating uses such as office, commercial, and light industrial development. The proposal establishes a binding site plan for an existing office park development and allows the property to be divided into individual lots while maintaining coordinated circulation, parking, utilities, and infrastructure. This supports continued employment activity and efficient use of urban land consistent with the Land Use Element.

Conclusion: Standard Met.

B. Economic Development Element

The following policies from the Economic Development Element apply to the proposal:

- **ED-2:** “Ensure that Puyallup offers a fair and predictable regulatory environment for businesses that is competitive with other jurisdictions and responsive to private sector concerns.”
- **ED-2.2:** “Designate and zone lands sufficient to accommodate the projected urban growth including, in an appropriate balance, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses.”
- **ED-5:** “Work with businesses and residents in South Hill to make this area a vibrant center with housing and increased economic activity.”

Discussion: The proposal supports continued employment activity within an existing business park development. By allowing individual ownership of lots while maintaining shared access and infrastructure, the binding site plan facilitates ongoing business operations and potential reinvestment within the employment district consistent with the Economic Development Element.

Conclusion: Standard Met.

C. Natural Environment Element

The following policies from the Natural Environment Element apply to the proposal:

- **NE-3:** “Protect, integrate, and restore critical areas and their functions and values through conservation, enhancement, and stewardship of the natural environment.”
- **NE-3.3:** “Conserve and protect environmentally critical areas from loss or degradation. Maintain as open space landslide and erosion hazardous areas, frequently flooded areas, fish and wildlife habitat conservation areas, shorelines and wetlands, and their buffers.”
- **NE-3.4:** “Avoid land uses and developments that are incompatible with environmentally critical areas and creation of new lots for building sites that are entirely within critical areas or their associated buffers; protect critical area functions based on the intensity of land uses near them.”
- **NE-3.6:** “Ensure critical area regulations provide reasonable economic use for all properties within Puyallup when taking into account the entire property.”

Discussion: Environmental review identified wetlands and associated buffers on the site. The binding site plan identifies and delineates each of the wetlands. The small wetlands are located on lots that are large enough to accommodate both development and protection of the wetland areas. The large wetlands and their associated buffers have been placed in protective tracts, rather than buildable lots. This ensures that these areas will not be sold or developed in the future.

Environmental review also addressed vapor intrusion mitigation associated with historical site contamination. The proposal does not introduce new environmental impacts and maintains compliance with applicable environmental regulations.

Conclusion: Standard Met.

D. South Hill Neighborhood Plan

The following policies from the South Hill Neighborhood Plan apply to the proposal:

- **SH-1:** “Establish a land use pattern and intensity that encourages residents to walk, bicycle, and actively engage in their community, and a growing number of people live and work in the neighborhood as land uses intensify and diversify.”
- **SH-2:** “Ensure that the South Hill Center has a dynamic mix of uses that both complement one another to create a place where people can live, work, shop, and recreate, and that also strengthens the area as a regional draw for shopping and employment.”
- **SH-5:** “Develop and maintain existing business parks, manufacturing, and public facility properties in a manner that encourages visual compatibility, aesthetics, and connectivity within the neighborhood, and encourages living wage employment.”

Discussion: The project site is located within the South Hill Neighborhood planning area and functions as a business park development. The proposal includes a public pedestrian trail easement to encourage residents, visitors, and employees in the neighborhood to access the Bradley Lake Park trail system through the South Hill Business and Technology campus. The proposal maintains the business park as an employment center while allowing for future expansion.

Conclusion: Standard Met.

Overall Conclusion:

The proposed Binding Site Plan meets the approval criteria of PMC 19.12, maintains coordinated access and utilities, protects identified critical areas, and is consistent with the Puyallup Comprehensive Plan (2044).