CITY OF PUYALLUP

Development & Permitting Services
333 S. Meridian, Puyallup, WA 98371
(253) 864-4165 | Fax (253) 840-6678
www.cityofpuyallup.org

December 21, 2021

Mark Johnson
3600 136th Pl SE
Bellevue WA, 98006
E-MAIL: MarkJ@Benaroya.com

DEVELOPMENT REVIEW TEAM (DRT) LETTER	
PERMIT #	P-21-0033
PROJECT NAME	SH & TECHNOLOGY PARKING EXPANSION /BENAROYA
PERMIT TYPE	SEPA
PROJECT DESCRIPTION	SH & TECHNOLOGY PARKING EXPANSION
SITE ADDRESS AND PARCEL #	1019 39TH AVE SE 0419034037
ASSOCIATED LAND USE PERMIT(S)	E-21-0313
APPLICATION DATE	April 1, 2021
APPLICATION COMPLETE DATE	May 4, 2022
PROJECT STATUS	**Final Development Review Team (DRT) letter – FINAL ENVIRONMENTAL REVIEW (SEPA).** Latest revised copy of submitted materials has fulfilled the city's requirements related to the SEPA ENVIRONMENTAL REVIEW of the permit in accordance with the following conditions and notes. The project is now proceeding into final SEPA issuance. A SEPA Mitigated Determination of Non-Significance (MDNS) will likely be issued shortly following this letter. Please be aware, that this is not approval of the related civil permit E-21-0313, this letter only relates to the required environmental review of that permit.
CONDITIONS	**See notes and conditions below**. The project shall conform to all conditions outlined herein and shall comply with all applicable provisions of the Municipal Code and any SEPA conditions

HOW TO USE THIS LETTER

This review letter includes two sections: **"Action Items"** and **"Conditions".**

The **"Action Items"** section includes all items that the applicant must address to comply with the Puyallup Municipal Code (PMC) and city standards. Items listed in under **Action Items** require a resubmittal under this permit for further review by the Development Review Team (DRT); your application is not approved. Please make those updates to the proposed plans and resubmit for review. Please include a response letter outlining how you have revised your proposal to meet these items for ease of plan check by DRT members.

The "**Conditions"** are items that will govern the final permit submittal(s) for the project. Please be aware that these conditions will become conditions of the final permits and/or recommendations to the Hearing Examiner, if applicable.

If you have questions regarding the action items or conditions outlined in this letter, please contact the appropriate staff member directly using the phone number and/or email provided.

ACTION ITEMS

PLANNING - Rachael Brown (253) 770-3363 rnbrown@puyallupWA.gov

No actions requiring a resubmittal under this permit application at this time; conditions are shown below. Conditions may affect final plan submittal documents, please review and contact staff if you have questions.

ENGINEERING - Mark Higginson (253) 841-5559 mhigginson@puyallupWA.gov

No actions requiring a resubmittal under this permit application at this time; conditions are shown below. Conditions may affect final plan submittal documents, please review and contact staff if you have questions.

TRAFFIC – Bryan Roberts (253) 841-5542 broberts@puyallupWA.gov

No actions requiring a resubmittal under this permit application at this time; conditions are shown below. Conditions may affect final plan submittal documents, please review and contact staff if you have questions.

FIRE PREVENTION – David Drake (253) 864-4171 ddrake@puyallupWA.gov

No actions requiring a resubmittal under this permit application at this time; conditions are shown below. Conditions may affect final plan submittal documents, please review and contact staff if you have questions.

1. Below items may change parking lot layout. Consider those items prior to CIVIL Review.

BUILDING – Choose an item.

No actions requiring a resubmittal under this permit application at this time; conditions are shown below. Conditions may affect final plan submittal documents, please review and contact staff if you have questions.

CONDITIONS

The following are conditions of approval. All future civil and/or building permit submittals shall comply with the following conditions.

PLANNING - Rachael Brown (253) 770-3363 rnbrown@puyallupWA.gov

1. No Planning Conditions

ENGINEERING - Mark Higginson (253) 841-5559 mhigginson@puyallupWA.gov

The following comments are associated with the April 2021 Preliminary Stormwater Report. The applicant is not required to respond to these comments at this time and Engineering is satisfied that appropriate documentation has been provided to allow the project to move forward to SEPA Issuance. <u>However, these comments must be thoroughly addressed at time of civil permit application</u>:

2. <u>Basin A</u>: The preliminary storm report indicates the use of premanufactured retention chambers to infiltrate stormwater runoff. However, the geotechnical report indicates that the southern half of Basin A has zero infiltration capability, and the northern half has shallow groundwater which does not provide the minimum separation required by the Ecology Manual (5-ft minimum). Amend the design accordingly.
3. <u>Basin B</u>: The preliminary storm report indicates that Basin C will run-on to Basin B in "negligible volumes". Please incorporate Basin C into the WWHM modeling as a lateral basin tributary to Basin B.
4. <u>Basin D and Basin E</u>: According to the pre-development basin exhibit, Basin C and a portion of Basin B are tributary to an existing closed depression (pothole) on the property (Basin E-post developed) which appears to have no outlet and is also classified as a wetland. As a result, the project applicant shall comply with the following conditions:
   - Any developed flows to the pothole shall match the predeveloped flowrates for the 2-, 10-, and 100-year recurrence interval flows.
   - Document the tributary area to the pothole and provide an analysis of surface water elevations and volume using a continuous runoff model for the 100-year recurrence interval developed condition.
   - Potential overflow routes from the pothole shall be analyzed, using the fully developed contributing basin and any potential adverse impacts shall be identified and mitigated.
   - Provide hydroperiod analysis to ensure the wetland's hydrologic conditions, hydrophytic vegetation, and substrate characteristics are maintained. Refer to the WWHM "High Groundwater/Wetland" Element for the pothole/wetland in accordance with the DOE Manual, MR8 and Appendix I-D.

5. <u>Basin D and Basin E Continued</u>: The report uses the term "full dispersion" in places. Please note that Basin D exceeds the 65% developed area constraint which would forego the use of full dispersion.
   - Please note that the vegetated flow path from Basin D to the wetland is less than 50-ft which requires adjustments to the surface-type characteristics required for MR7 Flow Control.
   - The constructed slope at the transition between Basin D and Basin D exceeds the 20% limitation of BMP T5.12.
6. <u>Basin F</u>: The report states that runoff will "infiltrate into the subgrade" and any excess runoff will be conveyed "into a bioretention cell in Basin A".
   - Based on the geotechnical information provided, there is no substantiation of the wet season high groundwater elevation or verification of the hydraulic conductivity testing in this basin. Please provide geotechnical investigation results which support the use of infiltration if that is the ultimate design intent.
   - If Basin F runoff is tributary to Basin A stormwater facilities, provide appropriate WWHM modeling characteristics, e.g., use of the lateral basin element.

7. <u>Basin G</u>: Basin G consists of 6,500sf of disturbed area and landscaping. This area must be accounted for in the WWHM modeling, either retention/detention, bypass, lateral basin, or other BMP.
8. <u>Section 7.5 Requirement #5</u>: Minimum Requirement 5 (MR5) requires LID Performance Standard or List 2 compliance. <u>For each basin</u>, provide confirmation of LID Performance Standard compliance using WWHM, or document the feasibility/infeasibility of List 2 BMPs.
9. <u>Section 8.1 Methodology:</u>
   - It was commented that "Pre-development basins were modelled as hydrologic soils type A/B, forested land". However, the WWHM models provided used soil type C. Please revise accordingly.

- Reference is made to the use of “full dispersion”. Please be aware that Basin D exceeds the Ecology Manual 65% developed area limitation which would forego the use of full dispersion.
- Any basin utilizing Full Dispersion for stormwater control shall be protected in perpetuity by a recorded Covenant.

10. Appendix A, Geotechnical Report:
    - Section 4.2; it appears that PIT 6-20 may be mislabelled.
    - Section 4.3; provide wet-season high groundwater elevation for MW1-20 and MW2-20. For any basins utilizing infiltration, the geotechnical engineer shall provide supporting documentation for wet-season high groundwater elevation(s) and hydraulic conductivity in accordance with the Ecology Manual and City of Puyallup requirements.
    - NOTE: If the tributary area to any proposed infiltration facility exceeds 1-acre and the depth to groundwater is less than 15-ft, conduct a mounding analysis to determine the final design infiltration rate. Ref. Vol. III, Section 3.3.8.

11. Appendix D, WWHM Modeling:
    - Identify the rain gage being used for the project site.
    - Soil type A/B was specified in Section 8.1 Methodology, but Soil Type C was used in the modeling. Provide clarification for the change in soil type.
    - Basin A analysis (Vault EG) does not use Forested in the pre-developed condition...revise accordingly.
    - Please provide better descriptions of the basins being analyzed. For example, the basin associated with POC3 is 0.53 acres which does not agree with any basin noted on the Post-Development exhibit. Also, in the Pre-dev Scenario, there is a basin called "Parking Aisles", 0.53 acres, but in the Mitigated Scenario there is a basin called "Drive Aisle", 0.5 acres...are these supposed to be the same subbasin?
    - Provide the WWHM LID performance results for each basin..

These next comments are general in nature and are intended to assist the applicant with incorporating City requirements into the project design documents, but should not be considered an exhaustive list of all necessary provisions from the PMC, design standards, or the Ecology stormwater manual.

GENERAL:

12. Engineered plans must follow the latest regulations and standards set forth in the Puyallup Municipal Code (PMC), the City Standards for Public Works Engineering and Construction (design standards), and the current City adopted stormwater manual at the time of civil permit application [PMC 21.10.040].
13. In accordance with recent revisions to RCW 19.27 and RCW 19.122, any project within 100-ft of a major utility transmission line (hazardous liquid or gas) shall provide notice to the utility operator. Prior to permit issuance, provide written documentation from the operator/owner of the Northwest Pipeline LLC (Williams Gas Main) that the proposed development is acceptable as designed.

STORMWATER/ EROSION CONTROL:

14. Stormwater design shall be in accordance with the 2012 Stormwater Management Manual for Western Washington as amended in the December, 2014 (The 2014 SWMMWW aka “Ecology Manual”).
15. The applicant shall complete the stormwater flowchart, Figure 3.1, contained in Ecology’s Phase II Municipal Stormwater Permit, Appendix I. The completed flowchart shall be submitted with the preliminary stormwater site plan and highlight the Minimum Requirements (MR) triggered by the project thresholds. The link below may be used to obtain the flowchart:

Western Washington PH II Stormwater Permit

16. At the time of civil permit application, the applicant is responsible for submitting a permanent storm water management plan which meets the design requirements provided by PMC Section 21.10. [PMC 21.10.190, 21.10.060]
    - When using WWHM for analysis, provide the following WWHM project files with the civil permit application:
        - Binary project file (WHM file extension)
        - ASCII project file (WH2 file extension)
        - WDM file (WDM file extension)
        - WWHM report text (Word file)

17. The written technical report shall clearly delineate any offsite basins tributary to the project site and include the following information: [PMC 21.10.060]
    - the quantity of the offsite runoff;
    - the location(s) where the offsite runoff enters the project site;
    - how the offsite runoff will be routed through the project site.
    - the location of proposed retention/detention facilities
    - and, the location of proposed treatment facilities

18. Each section of the TIR/SSP shall be individually indexed and tabbed with each permit application and every re-submittal prior to review by the City. [PMC 21.10.060]
19. Development and redevelopment projects are required to employ, wherever feasible, Low Impact Development (LID) Best Management Practices (BMPs) to meet the design criteria set forth in PMC 21.10.190, the Ecology Manual Volume I, Minimum Requirement 5; Volume III, Chapter 3; and Volume V, Chapter 5.
20. **Preliminary feasibility/infeasibility testing for infiltration facilities/BMPs** shall be in accordance with the site analysis requirements of the Ecology Manual, Volume I, Chapter 3, specifically:
    - **Groundwater evaluation**, either instantaneous (MR1-5), or continuous monitoring (MR1-9), during the wet weather months **(December 21 through April 1)**.
    - **Hydraulic conductivity testing**:
        i. If the development meets the threshold to require implementation of Minimum Requirement #7 (flow control); **or**, if the site soils are consolidated; **or,** if the property is encumbered by a critical area, then Small Scale Pilot Infiltration Testing (PIT) during the wet weather months **(December 21 through April 1)** is required.
        ii. If the development does not meet the threshold to require implementation of Minimum Requirement #7; or, is not encumbered by a critical area; and is located on soils unconsolidated by glacial advance, grain size analyses may be substituted for the Small Scale PIT test at the discretion of the review engineer.
    - Testing to determine the **hydraulic restriction layer**.
    - **Mounding analysis** may be required in accordance with Ecology Volume III Section 3.3.8.

21. If infiltration facilities/BMPs are anticipated, the number of infiltration tests shall be based on the area contributing to the proposed facility/BMP, e.g., one test for every 5,000 sq. ft of permeable pavement, or one test for each bioretention cell.
22. The proposed project is part of a larger, common plan of development, and includes the use of existing stormwater facilities. The Technical Information Report (TIR) or Stormwater Site Plan (SSP), shall provide supporting documentation and engineering calculations which substantiate the affect of the proposed project in regards to the design assumptions of the existing stormwater facilities. [PMC 21.10.060]

23. Upon submission of the geotechnical infiltration testing, appropriate long-term correction factors shall be noted for any areas utilizing infiltration into the underlying native soils in accordance with the Ecology Manual, Volume III, Chapter 3.
24. Overflow facilities shall be provided for any proposed detention/retention (R/D) facilities in accordance with the City Standards. This includes a downstream analysis a minimum of ¼ mile downstream from the site.
25. Water quality treatment of stormwater shall be in accordance with the Ecology Manual, Volume 1, Minimum Requirement 6; and Volume 5, Runoff Treatment.
26. The applicant proposes to use bioretention cells for water quality treatment, the following notes shall be added to the civil design plans:
    - "At the completion of the bioretention cells construction, the engineer-of-record shall provide a written statement to the City of Puyallup that the bioretention cells were built per the approved design."
    - "The bioretention soil media (BSM) supplier shall certify in writing that the bioretention soil media meets the guidelines for Ecology-approved BSM including mineral aggregate gradation, compost guidelines, and mix standards as specified in the 2012 Low Impact Development Technical Guidance Manual for Puget Sound. And, if so verified, no laboratory infiltration testing, cation exchange, or organic content testing is required."

27. At the time of civil permit application, all pipe reaches shall be summarized in a Conveyance Table containing the following minimum information and included in the TIR:

Pipe Reach Name	Design Flow (cfs)
Structure Tributary Area	Pipe-Full Flow (cfs)
Pipe Diameter (in)	Water Depth at Design Flow (in)
Pipe Length (ft)	Critical Depth (in)
Pipe Slope (%)	Velocity at Design Flow (fps)
Manning's Coefficient (n)	Velocity at Pipe-Full Flow (fps)
	Percent full at Design Flow (%)
	HGL for each Pipe Reach (elev)

28. All storm drains shall be signed as follows:
    a) Publicly maintained stormwater catch basins shall be signed using glue-down markers supplied by the City and installed by the project proponent.
    b) Privately maintained stormwater catch basins shall be signed with pre-cut 90ml torch down heavy-duty, intersection-grade preformed thermoplastic pavement marking material. It shall read either "Only Rain Down the Drain" or "No Dumping, Drains to Stream". Alternatively, the glue-down markers may be purchased from the City for a nominal fee.

29. All private storm drainage facilities shall be covered by a maintenance agreement provided by the City and recorded with Pierce County. Under this agreement, if the owner fails to properly maintain the facilities, the City, after giving the owner notice, may perform necessary maintenance at the owner's expense.
30. A Stormwater Systems Development fee will be assessed for each new equivalent service unit (ESU) in accordance with PMC Chapter 14.26. Each ESU is equal to 2,800 square feet of 'hard' surface. The current SDC as of this writing is $3,360.00 per ESU.
31. Stormwater Systems Development fees are due at the time of site development permit or in the case where no site development permit is required, at the time of building permit issuance for the individual lot(s); and the fees do not vest until the time of site development permit issuance, or at the time of building permit issuance in the case where a site development permit is not required.

32. A Construction Stormwater General Permit shall be obtained from the Department of Ecology if any land disturbing activities such as clearing, grading, excavating and/or demolition will disturb one or more acres of land, or are part of larger common plan of development or sale that will ultimately disturb one or more acres of land. The link below may be used to obtain information to apply for this permit:

Construction Stormwater General Permit

GRADING:

33. A Grading Plan conforming to all requirements of PMC Section 21.14.120 will be required for this project. The Plan shall be prepared by a Civil Engineer licensed in the State of Washington. [PMC 21.14.070]
34. A geotechnical report conforming to all requirements PMC Sections 21.14.150 and 21.14.160 will be required for this project. The Report shall be prepared by a Civil Engineer or Engineering Geologist licensed in the State of Washington. Prior to final acceptance of this project, the author of the Report shall provide certification to the City the project was constructed in accordance with the recommendations contained in the report.
35. Erosion control measures for this site will be critical. A comprehensive erosion control plan will be required as part of the civil permit application.
36. At the time of civil permit application, the following notes shall be added to the first sheet of the TESCP:
    - "At any time during construction it is determined by the City that mud and debris are being tracked onto public streets with insufficient cleanup, all work shall cease on the project until this condition is corrected. The contractor and/or the owner shall immediately take all steps necessary to prevent future tracking of mud and debris into the public ROW, which may include the installation of a wheel wash facility on-site."
    - "Contractor shall designate a Washington Department of Ecology certified erosion and sediment control leadperson, and shall comply with the Stormwater Pollution Prevention Plan (SWPPP) prepared for this project."
    - "Sediment-laden runoff shall not be allowed to discharge beyond the construction limits in accordance with the Project's NPDES General Stormwater Permit."
    - "Any permanent infiltration system shall not be utilized for TESC runoff. Connect to infiltration facilities only after construction is complete and the site is stabilized and paved."

37. **RCW 19.122 requires all owners of underground facilities to notify pipeline companies of scheduled excavations through the one-number locator service if proposed excavation is within 100 feet. Notification must occur in a window of not less than 2 business days but not more than 10 business days before beginning the excavation. If a transmission pipeline company is notified that excavation work will occur near a pipeline, a representative of the company must consult with the excavator on-site prior to excavation.**

MISC:

38. Engineering plans cannot be accepted until Planning Department requirements have been satisfied, including but not limited to, SEPA, Preliminary Site Plan approval, CUP, and/or Hearing Examiner conditions.
39. Civil engineering drawings will be required for this project.
    - At the time of civil application, submit electronic files in PDF format, through the City's Permit Portal. Contact the Permit staff via email at PermitCenter@ci.puyallup.wa.us for the initial project submittal.

40. Civil engineering plan review fee is $470.00 (plus an additional per hour rate of $130.00 in excess of 5 hours). The Civil permit shall be $300.00 and the inspection fee shall be 3% of the total cost of the project as calculated on the Engineering Division Cost Estimate form. [City of Puyallup Resolution No. 2098]

41. Benchmark and monumentation to City of Puyallup datum (NAVD 88) will be required as a part of this project.
42. Engineering plans submitted for review and approval shall comply with City Standards Section 1.0 and Section 2.0, particularly:
    - Engineering plans submitted for review and approval shall be based on 24 x 36-inch sheets.
    - The scale for design plans shall be indicated directly below the north arrow and shall be only 1"=20' or 1"=30'. The north arrow shall point up or to the right on the plans.
    - Engineering plan sheets shall be numbered sequentially in this manner: Sheet 1 of 20, Sheet 2 of 20, etc. ending in Sheet 20 of 20.

43. All applicable City Standard Notes and Standard Details shall be included on the construction plans for this project. A copy of the City Standards can be found on the City's web site under City Engineering, Development Engineering.

44. Prior to Acceptance/Occupancy, Record Drawings shall be provided for review and approval by the City. The fee for this review is $200.00. Record Drawings shall be provided as follows:
    - In accordance with City Standards Manual Section 2.3.
    - Electronic version of the record drawings in the following formats:
        1. AutoCAD Map 2007 or newer in State Plane South Projection
        2. PDF

TRAFFIC – Bryan Roberts (253) 841-5542 broberts@puyallupWA.gov

45. Traffic impacts will be assessed at time of building permit application.
    a. Prior to building permit issuance, the applicant shall conduct a traffic analysis to determine impacts of a proposed full buildout of site. This requirement will be triggered for any building improvement, building expansion, change of use, etc.
    b. Increasing existing on-site parking capacity from 865 to 1,535 stalls will likely be associated with an increase in vehicle trips compared to the previous use.
    c. Applicant shall provide a detailed summary of all building permits and/or off-site improvements associated with this site since original construction was completed. This summary shall include all previous mitigation and/or traffic impact fees paid.
    d. Based on previous EIS & Concomitant agreement, must provide a determination on the overall quantity of vested vehicle trips to this site.

46. Per previous pre-application meeting (P-20-0040):
    a. The existing eastern most driveway on 39th Avenue SE will be required to limit turning movements to right-in, right-out only. Signage, a raised channelization device, and striping will likely be required to assure left turns into and out of the site cannot circumvent the restriction.
    b. Existing driveway location along 39th Ave SE does not meet current driveway separation standards (300ft for Major Arterial Roadways). This separation requirement applies to driveways located on both sides of the street. The required access restriction (right-in/right-out) will help mitigate deficient driveway spacing standards.

47. Development of this site will be subject to City engineering standards, impact fees, and municipal code at the time of application.

FIRE PREVENTION – David Drake (253) 864-4171 ddrake@puyallupWA.gov

48. Fire Hydrants are required in parking lot. Provide locations on site plan. This could affect the layout.
49. Provide dimension of parking lot isles. This could affect the layout.

50. Provide Auto-turn or equivalent program to demonstrate fire apparatus turning radiuses. This could affect the layout.
51. Provide current locations of Fire Hydrants, FDC's, and PIV's in parking lots. I believe some of these items are currently in the wooded area. Parking stalls shall not block access to these. These existing items may need to be moved depending on the locations. This could affect the layout.

BUILDING – Ray Cockerham (253) 841-5585 rayc@puyallupWA.gov

52. Subject to permit submittal and review per applicable building codes.

If you have questions regarding any of the action items or conditions outlined above, please contact the appropriate staff member directly using the phone number and/or email provided.

Sincerely,

Rachael Brown
Associate Planner
(253) 770-3363
rnbrown@puyallupWA.gov