

Freeman Rd Logistics SEPA Checklist Feedback

This feedback is provided by Joyce and Steve Asbjornsen owners of parcels 0420201036, 0420205004, and 0420201008. There are three feedback files, two addressing the site plan while this document addresses the SEPA Checklist.

This portion of the feedback addresses the SEPA Environmental Checklist submitted with the P-21-0136 Site Plan. The Checklist items are not recreated here and the list should be referenced for context when reading the comments provided. Each comment is preceded by section and item number of the item in the list that is being addressed.

Section A

10. (pg 3) Puyallup requires demolition permits but that is not acknowledged on this list.

11. (pg 3) The applicant's response includes the statement "Stormwater will be handled with an underground gallery or vault." In homes adjacent to the project site, basements will flood with 3-4 feet of water during heavy, **multi-week rain periods** that occur every 2-3 years. After the rains, it would take weeks for the water in the basements to recede. That could indicate that ground water levels can be as shallow as 4-5 feet below the surface during heavy rain periods. For underground vaults to be effective during sustained heavy rains, they must either have the capacity to handle the entire water flow during such periods or be able to disperse the water through an outlet. It is not clear if an underground vault could be effective in preventing damaging water flows in a discharge area if water tables can be within 4-5 feet of the surface.

Section B

- 1(c). (pg 4) The applicant accurately refers to "alluvial deposits" as the type of soil present but doesn't call out clay content or the percentage of clay content present. There is enough clay that when compacted soil in the area becomes wet, it is very slippery. This level of clay content can prevent expected downward flow of surface water and subsequent surface water drainage. We are concerned that lack of attention to the clay content could influence assumptions on overall surface water issues.

- 1(e). (pg 5) This section indicates a substantial amount of fill adjacent to existing homes and their wells & septic systems. How will potential damage be assessed and subsequent corrective action taken to prevent impact during construction and occupancy?
 - If well flows decline or stop after the transition of 17 acres from permeable to impermeable surfaces per section 1(g), who will pay for corrective action?

 - If septic systems begin to fail from an elevated level of ground water associated with development of the site, such conditions would likely make permits for new septic

systems in the area impermissible. To that end, both base flood elevation (BFE) levels and variation range from BFE should be established before construction. Should a septic system failure occur after construction within a reasonable proximity to the site, and any such failure is associated with detrimental variance of the BFE or the normal range of water table variance, then the developer (applicant) should be held liable for the failure and the cost of any corrective action. Cost would include connection to the proposed sewer system if one is deemed necessary.

- 3(a)(1). (pg 6) To the question regarding the proximity of any surface water body, the reply states there are no streams “within 2,000 feet of the site” per a critical areas report by Anchor QEA dated October 2021. However, the distance between the site and Wapato Creek to the north (a salmonid stream) is approximately 1,200 ft. Also, a wetland on parcel 0420201008 is less than 220 ft. from the site. The report represents a substantial misrepresentation of the facts and brings the integrity of the entire report into question.
- 3(c)(1) pg 9.
 - The drainage ditch referred to in the response empties into Wapato Creek (a salmonid stream) and was historically maintained by a special surface water management board reporting to Pierce County. The board was disbanded last year leaving the coordinated maintenance of the ditch in question.
 - It is also not clear if the entire length of the ditch has sufficient flow capacity to handle a likely substantial increase in water volume from the conversion of approx. 17.7 acres of the site from permeable to impermeable surface. If the ditch cannot support the required water volumes, an overflow of the ditch could negatively impact, if not damage, existing residents and businesses. The thorough analysis of the likely water volumes and the ongoing flow capacity of the ditch through anticipated maintenance cycles needs to be conducted. Responsibility for maintenance of the entire length of the ditch must also be clearly established as well as liability for maintenance neglect.
- 3(c)(3) pg 9.
 - During heavy rains, surface water from parcel 0420201036 runs toward parcel 0420201027. If fill associated with the site prevents the natural migration of surface water from parcel 0420201036 to parcel 0420201027, there is potential for surface flooding to occur on parcel 0420201027. What mitigation efforts will be included to prevent such surface flooding which could damage crops or equipment in the area?
 - During heavy rains, surface water from parcel 0420205004 runs toward parcel 0420205003. If fill associated with the site prevents the natural migration of surface water from parcel 0420205004 to parcel 0420205003, there is potential for surface flooding to occur on parcel 0420205004 and possible failure of the septic system near the southern boundary of parcel 0420205004. What mitigation efforts will be included to prevent such surface flooding which could damage crops or equipment in the area or failure of the adjacent septic system?

- 5(a) (pg 11). There is a larger animal/wildlife presence near the site than listed.
 - Hawks live in the adjacent tree line east of the site
 - Deer have been living in the adjacent wetland area south of the site and wander on the site
 - Squirrels, coyotes and skunks can regularly be found wandering in and around the site
 - Ducks and Canadian Geese are regular seasonal visitor in the wetlands south of the site
 - Wapato Creek, approximately 1200 feet north of the site, is a well-documented salmonid stream
- 7(a) (pg 13). Vector indicates there are no expected environmental health hazards but there is no tenant identified as of yet. Will there be occupant restrictions that prohibit such materials from being brought onsite without approval from Puyallup and any appropriate precautions should they be needed?
- 7(a)(1) (pg 13). There are homes currently or previously on the site that are known to have used oil heat and may have abandoned/decommissioned underground oil tanks. There is no known contamination, but excavation efforts should comprehend the potential for such tanks and the possibility that mitigation efforts might be required if the integrity of any such tank has been compromised or could be compromised during excavation.
- 7(b)(2) (pg 14).
 - During operation, there is concern that tenants involved in loading and unloading operations, tractor backup alarms, braking noise and acceleration noise from trucks entering and leaving the site, any refrigerated trailers, and/or tractors idling for long periods could create disruptive noise for nearby residents during sleeping hours. We request that the landscaping buffer be designed to prevent such disruptions and a specific measurable noise level threshold be established. If any operations exceed that noise level on a parcel in residential use, the city must have the authority to restrict or prevent that activity during sleeping hours (e.g., 9pm to 7am).
 - There is high potential that an increase of over 100 heavy trucks per day from the site will substantially increase the traffic noise for Fife and tribal residents, as well as remaining Puyallup residents along Freeman Rd E, and degrade the quality of life for these long-term residents. There has been no identification of a mitigation effort for this issue. Additional heavy truck traffic from Valley Ave and 48th St E from the Pape site is likely to occur if Freeman Rd E is upgraded to support commercial traffic making the situation worse.

Truck traffic from the site should be diverted away from the residential area on Freeman Rd E by routing trucks north of 22nd Ave NW to Valley Ave via a truck entrance north of 48th St E and trucks south of 22nd NW should be routed to N. Levee via a truck entrance

on the very southern end of the site. No trucks should be allowed on 22nd Ave NW. A heavy truck deterrent between the northern and southern truck entrances (such as a roundabout on Freeman Rd and 48th St E) would deter not only heavy trucks from the site passing residential homes, it would also deter additional trucks from N. Levee Rd and Valley Ave from using Freeman Rd as a preferred truck route. A roundabout would allow Freeman Rd to remain two lanes where residences were located on both sides of the road. Such a deterrent could be designed with no encroachment on tribal reservation land as illustrated in the drawing viewable [here](#). This is a viable, reasonable and practical way of mitigating heavy traffic noise from a long standing residential area facing Freeman Rd E. And it addresses the concerns of the 44 residents who signed a Fife petition objecting to the project which can be viewed [here](#).

- 8(a) (pg 15). There are also residential uses on the east side of the site. Specifically on parcel 0420201032.
- 10(b) (pg 19). Some Fife homes on the west side of Freeman Rd E with views of Mt. Rainier would no longer have such a view reducing the desirability and possibly the value of the homes.
- 14(a) (pg 21). As described in the accompanying document, “Freeman Rd Logistics Site Plan Drawing Feedback.pdf”, it is not clear that Vector has the right to access 19th Ave NW which is a private road.
- 14(d) (pg 22).
 - There is strong concern that the Freeman Rd roadbed is not stable enough to support a major increase in the amount of heavy commercial vehicle traffic resulting from this project. This is especially true between 19th Ave NW and N. Levee Rd where there is a significant and consistent amount of water in the area at all times and a substantial slope on the east side of Freeman road. Water from both the Puyallup River and the wetlands (which has standing water all year round) can both rise to a level within a few feet of the road surface during heavy rain periods.

Given the amount of road repair already required on N Levee Rd in front of Puyallup’s existing warehouses (where the adjacent steep slope on the Puyallup River side is reinforced with concrete slabs), it’s hard to imagine that far more damage would not occur where this section of Freeman Rd abuts an even steeper slope and there is no cement panel reinforcement.

To accurately characterize the stability of the roadbed in the presence of the steep slope, it may be necessary to acquire roadbed core samples to a depth of at least 20’ to establish the expected performance of the roadbed during heavy rain conditions.

- There is strong concern the assumption that all heavy truck traffic from the project will come from and to N. Levee Rd is fallacious if not irrational. Trucks traveling to the Port of Tacoma will not hesitate to use Valley Ave to the north, especially with the number of turns required to access the 70th Ave E after the new Puyallup River bridge is built for the Canyon Rd project. When the SR-167 extension is complete, the ramps on Valley

Ave will attract even more truck traffic to the north. Attempts to regulate weight limits, direct truck traffic, and even speed limits on Freeman Rd have been frustrated by lack of traffic enforcement actions which the city of Fife has long conceded.

Efforts to improve commercial traffic conditions on Freeman Rd will also serve as a magnet for commercial traffic from, to, or crossing over Valley Ave; generating more heavy commercial traffic than expected along the entire length of Freeman Rd from N. Levee to Valley Ave. Should that happen, then the stability of the roadbed near Wapato Creek becomes relevant, necessitating an upgrade of the roadbed north of the project as well.

For that reason, there is a need for a roundabout or other commercial traffic deterrent on Freeman Rd near 48th street as described in detail in the feedback on Section B, item 7(b)(2) above.

- We are **gravely concerned** that adding any more south bound traffic of any type on Freeman Rd E before substantial traffic flow improvements can be made will be intolerable. Per this video clip [link](#) (25 sec) and this photo [link](#), south bound rush hour traffic can back up from N. Levee Rd to 48th St E – TODAY! There is no conceivable Level of Service (LOS) that would define a nearly half mile backup on a regular basis as a compliant situation. We believe a plan for bringing Freeman Rd into compliance with a reasonable LOS should be developed and executed prior to any occupation of the site is allowed.
- 14(h) (pg23). We believe it is important that Fife assess transportation impact fees as well. It has been well known for a substantial amount of time that Fife has not had the resources to sufficiently police the traffic on Freeman Rd. (It is common to see vehicles exceeding 40-60 MPH on this 25MPH road several times a week). Since traffic generated by the site must travel on Freeman Rd E (which belongs to Fife), they will need resources to enable a commitment to enforce any weight restrictions or other traffic restrictions on Freeman Rd. And that commitment must be clear and well established before any occupancy of the site should be allowed.