



# CITY OF PUYALLUP

## Development and Permitting Services

333 S Meridian, Puyallup, WA 98371  
(253) 864-4165 Fax (253) 840-6678

February 16, 2022

To: Tyler Litzenberger

From: Jeff Wilson, City of Puyallup Development Services Director  
Steve Friddle, City of Fife Community Development Director

Re: SEPA checklist case ID P-21-0136

Dear Mr. Litzenberger,

The City of Fife and Puyallup jointly entered into a Co-Lead Agency SEPA status agreement on November 12, 2021 for the purposes of jointly administering SEPA review for your development proposal. We informed you on July 29, 2021 of the interagency decision to enter into an agreement; we forwarded you the executed copy of the agreement on November 16, 2021. Our staff have been conducting regular interagency coordination meetings since receiving your complete Preliminary Site Plan application and SEPA checklist (case ID P-21-0136 - deemed complete on November 17, 2021). We have also been coordinating with interested and impacted neighboring property owners, service and utility providers, Union Pacific railroad and the Puyallup Tribal government staff, as required by Puyallup Municipal Code (PMC) 20.54 Freeman Road Overlay Zone.

Our staff is concluding review of your submitted documents at the time of writing this letter. A technical review of the submitted documents and SEPA checklist preliminarily indicate a probable likelihood of significant adverse impact on environmental quality in the following areas:

1. **Transportation.**
  - a. Issues regarding how the traffic impact analysis was scoped are entirely unresolved; the TIA was prepared prematurely without agreed upon scope of the analysis. Significant issues remain regarding right of way dimensions and improvements (Freeman Road, 48<sup>th</sup> Street, etc), a proposed street vacation and relocation (access), pavement quality and modeled impacts, off-site intersection level of service (LOS) analysis, and traffic controls to ensure heavy haul routes are directed south to Levee Road. A complete list of issues are contained in our review letter (see attached).
2. **Utilities, including sanitary sewer, storm water and domestic water.**
  - a. **Sewer.** The project has not provided any plans, stated narrative or design to serve the site with sanitary sewer.
  - b. **Storm water.** The project contains technical flaws in the overall design and does not provide down stream analysis. Down stream properties contain facilities that are either at capacity or are Tribal government/Trust owned and will have challenges receiving new storm water runoff.
  - c. **Domestic water.** The domestic water line proposed is not extended to the site in a proper public water main easement – the site has not demonstrated service availability for domestic water, which also affects fire protection as well as water service for the development.
3. **Water, including wetlands, groundwater, surface water/runoff and flooding**
  - a. **Wetlands.** The project has not properly delineated and rated field verified off site wetlands to the east of the site, which will likely extend buffers into the development envelope, and

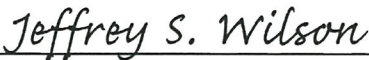
questions remain regarding areas of the development site that appear to exhibit wetland characteristics.

- b. **Surface water/runoff and flooding.** The site plan and supporting technical reports do not adequately assess the project's impact on receiving water bodies, nor does it account for flood water inundation on the site presently and the possible consequences of offsetting flood waters on site to down stream properties and receiving water bodies, including tribal trust property.
4. **Plants and animal habitat**
    - a. Wetland buffers may be impacted by the development envelope, as well as the chosen off site routing for a 40' water main line extension, which involves areas designated as wetland, buffer and areas of mapped sensitive habitats off site to the south.
  5. **Aesthetics**
    - a. The proposed site plan and design do not adequately buffer and setback proposed industrial development and structures from residential areas consistent with zoning code requirements.
  6. **Cultural resources**
    - a. Improperly scoped and conducted site investigation work regarding cultural resources must be addressed, per the requirements of code and in concert with Puyallup Tribe's archeological standards (site is in Puyallup Tribe reservation area).

The above summary is only meant to provide a high level summary of issues resulting from staff's technical review. Further specific details of city staff's technical review will be included in the included Development Review Team (DRT) letter.

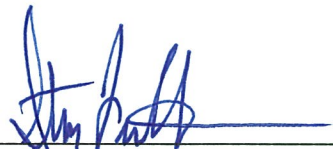
This letter is to inform you that based on the project and SEPA Checklist as submitted the Co-Lead Agencies are likely to issue a Determination of Significance (DS) for your project requiring the preparation of an Environmental Impact Statement (EIS). The initial review of environmental issues associated with your development proposal are reasonably sufficient to evaluate the environmental impact of your proposed development and many of the identified issues serve as a substantial basis to conclude your project will have a significant impact on the environment as identified above, unless resolved by a further design of your project. Significant progress and resolution on the above issues must be addressed in a substantial way upon a full resubmittal to avoid a DS on your project application.

Please let us know if you have any questions regarding this communication. We are available to meet virtually, or in person, to discuss further.



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**Jeffrey S. Wilson**  
City of Puyallup  
Director, Development and Permitting Services



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**Steve Friddle**  
City of Fife  
Director, Community Development

Cc: Chris Beale, Senior Planner, City of Puyallup  
Katie Baker, Planning Manager, City of Puyallup  
Jaime Carter, Development Engineer, City of Puyallup  
Bryan Roberts, Traffic Engineer, City of Puyallup  
Greg Vigoren, Public Works Director, City of Fife  
Brian Alvis, Development Engineering, City of Fife  
Andrew Strobel, Director of Planning, Puyallup Tribe