



City of Puyallup  
**Planning Division**  
 333 S. Meridian, Puyallup, WA 98371  
 (253) 864-4165  
 www.cityofpuyallup.org

February 17, 2022

VECTOR DEVELOPMENT COMPANY  
 11411 NE 124TH ST  
 KIRKLAND, WA 98034

DEVELOPMENT REVIEW TEAM (DRT) LETTER	
DRT #	1
PERMIT #	P-21-0136
PROJECT NAME	4723 FREEMAN RD E
PERMIT TYPE	Preliminary Site Plan
PROJECT DESCRIPTION	FREEMAN ROAD LOGISTICS / VECTOR DEVELOPMENT
SITE ADDRESS	4723 FREEMAN RD E, PUYALLUP, WA 98371;
PARCEL #	0420174075;
ASSOCIATED LAND USE PERMIT(S)	
APPLICATION DATE	November 02, 2021
APPLICATION COMPLETE DATE	November 17, 2021
<b>PROJECT STATUS</b>	<b><u>Active Development Review Team (DRT) review case – resubmittal required.</u></b> Please address review comments below and resubmit revised permit materials and by responding in writing to the remaining items that need to be addressed.
<b>APPROVAL EXPIRATION</b>	<b>N/A – Active permit application, not approved</b>
<b>CONDITIONS</b>	<p><b>Active permit application, not approved;</b></p> <p>Pursuant to PMC 20.11.022 regarding inactive applications, any and all pending land use applications or plat applications shall be deemed null and void unless a timely re-submittal is made to the City within 1 year of issuance of this Development Review Team (DRT) comment letter.</p> <p>DRT review letters typically identify requested corrections, studies or other additional required pieces of information necessary to demonstrate conformance with the City’s adopted development standards and codes.</p> <p>Subsequent applicant re-submittals shall make a good faith effort to respond to each request from this letter in order for the application to remain active.</p> <p>The failure to provide timely responses or lack of providing the requested material(s) within the 1-year window following DRT comment letter issuance shall be grounds for expiration, thus deeming the pending application null and void with or without a full or partial refund of</p>

	application fees.
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**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.

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## ACTION ITEMS

**Planning Review** - Chris Beale; (253) 841-5418; CBeale@PuyallupWA.gov

- Note to applicant: all comments with a [bracket] are related back to markups on the submitted plans in the CityView Portal for this permit.

SITE PLAN: Landscape perimeter buffering of 35' feet is required from the property line interior to the site development along the private 52nd Street roadway. The roadway abutment is a zoning adjoining line with a residential zone district, requiring a 35' buffer (PMC 20.35.035 (2)). [sheet a.1.1]

- SITE PLAN: The proposed alley along the western property edge of 0420201032 (Almont) must provide a 30' Buffer between the proposed alley and the property line, which will move the alley alignment over to the west. The alley must be a public way as it exceeds 200'. Fire Division may require a Fire turn around. [site plan sheet a.1.1]
- Off site wetland on WSDOT property [site plan sheet a.1.1]
- SITE PLAN: The proposed new 50th Street / 21st Ave NW cannot be a partial ROW. Additionally, a new ROW must provide a 30' buffer interior to the ROW along the north edge of TPN 0420201036. See feedback Director Jeff Wilson provided on April 14, 2021 (email). None of the previous feedback was incorporated. See Traffic notes for more information. [site plan sheet a.1.1]
- SITE PLAN: Building B is located too close to the new street right of way proposed; the site plan shows a 12' setback only. See PMC 20.35.023: "The maximum building height shall be equal to the proposed building setback within the first 35 feet of setback from an adjoining public street or residential zone. The maximum building height may be increased by one and one-half feet for each additional one foot of setback in excess of 35 feet up to the maximum permitted building height set forth in Table 20.35.020". The setback area shall be landscaped with a type I treatment. [site plan sheet a.1.1]
- DESIGN REVIEW: 15' of landscape border along the north and south facing elevations (foundation line) of building A area required. [site plan sheet A.1.1]
- DESIGN REVIEW: 15' of landscape border along the north and south facing elevations (foundation line) of building A area required. [site plan sheet A.1.1]
- LANDSCAPING: A 30' buffer must be provided along the truck parking fronting onto Freeman Road west of Building B, per the Freeman Road overlay. Please revise. [site plan sheet A.1.1]
- LANDSCAPING: A truck turnaround appears to encroach in the 30' buffer on the west side of building B (west side). [site plan sheet A.1.1]
- Truck stalls must contain a landscape break every 8 stalls in accordance with type IV standards [site plan sheet a.1.1]
- Truck stalls must contain a landscape break every 8 stalls in accordance with type IV standards [site plan sheet a.1.1]
- SEPA Review: Please review all comment documents and correspondence posted to the Cityview portal regarding your application. Please review and provide responses.
- SEPA Review status: The City of Fife and Puyallup are co-lead agencies for SEPA review. Please see the included cover letter from the co-lead agencies SEPA Responsible Officials. The project the submitted documents and SEPA checklist preliminarily indicate a probable likelihood of significant adverse impact on environmental quality in the following areas: Transportation; utilities, including sanitary sewer, storm water and domestic water; water, including wetlands, groundwater, surface water/runoff and flooding; plants and animal habitat; aesthetics; and, cultural resources

- SEPA - TRANSPORTATION: See Traffic review notes provided by Fife, Puyallup and Tribal agencies. City of Puyallup and City of Fife are coordinating on traffic review. The TIA is not approved and the report was written without approved scope by agencies. The findings of the TIA report are not approved at this stage – the SEPA review is tied to an appropriately scoped and studied TIA report. We are providing substantial feedback to revise the report - see joint Traffic review notes from Fife and Puyallup. Substantial study data is needed and off site impacts are anticipated and associated improvements are also anticipated to be required.
- SEPA - PUBLIC SERVICES AND UTILITIES: See Engineering notes for all technical review.
  - SANITARY SEWER: See Engineering notes for technical review. The site as no plan for sanitary sewer service presented in the application. On site large scale industrial septic systems may be environmentally improbable due to the direct proximity of the site to drinking water wells in the immediate areas surrounding the site and lack of set aside area for septic tank or drain field. The site is in the city of Puyallup’s sanitary sewer area and cannot be served by an outside utility (such as Fife) without an appropriate interagency agreement and transference of service area, which may require service area boundary modification or interagency agreement approval by the City Council.
- SEPA - PUBLIC SERVICES AND UTILITIES: See Engineering notes for all technical review. -
  - DOMESTIC WATER: See Engineering notes for technical review. The project proposal has no present approved plan to service the site with water or known water availability presented in the application. Issues with location of and need for a public water easement are not resolved. City staff has contacted the Shenk owners and Steve Asbjornsen and both owners report that no plan or negotiation is on going for water easement rights to be extended to the site. The proposed easement area to extend domestic water on private property must also be studied for critical area impacts on a revised critical area report. See Confluence’s peer review report.
- SEPA - PUBLIC SERVICES AND UTILITIES: See Engineering notes for all technical review. -
  - STORMWATER: See Engineering notes for technical review. In addition to staff’s technical review of the overall on site design approach, staff reached out to Puyallup Tribe government staff regarding discharge downstream of the site, which includes Tribe owned lands and Tribal Trust land (west side of Freeman Road – TPN 0420174031 and 0420174032). According to Tribe staff, discharge of storm water to trust lands will require a negotiated easement; further downstream properties owned by the Tribe will require permit approval to discharge to. See document titled “PUYALLUP TRIBE STORM DRAINAGE RESPONSE” in documents and images in the Cityview Portal for more information.

- **SEPA – SITE FLOODING:** The City has historical evidence and current observations of flooding at the project site. Recent rain events on the weeks of 01/02/22 – 01/09/22 demonstrated flood waters throughout major portions of the site, with overflowing water from the site onto Freeman Road in the NW corner. PMC 21.07.030 dictates the site be regulated under the definition of flood and reasonably safe from flooding. Under SEPA review, the issue of how the structures on site will be built to be safe from flooding and how the site plan design will take into account flood water stored on site during winter rain events and offset the impacts to flood storage (e.g. using compensatory flood storage methods) are unresolved and unaddressed. Habitat assessment report is also required. Resubmitted documents and technical studies are required. See Engineering notes on this issue for further details. Previous notes (see pre-app notes P-21-0011, March 22, 2021) still apply to this project, which stated:
  - The City has historical evidence of flooding at the project site, and as a result, any structures built onsite shall be flood protected to ensure the facilities are “reasonably safe from flooding” (RSFE) in accordance with PMC 21.07 flood plain regulations. The regulatory flood elevation governing protection shall be the Base Flood Elevation designated on the floodplain maps adopted by Pierce County.
  - If fill is proposed for the property and less than 1:1 compensatory storage is proposed, additional requirements of PMC 21.07 will apply, including but not limited to:
    - a written assessment shall include a hydrologic and hydraulic analysis to determine any effects on floodplain storage capacity, increased flood heights, or increased velocities.
    - The applicant shall submit a habitat assessment prepared by a qualified professional evaluating the effects and/or indirect effects of the proposed development (during both construction and post-construction) on floodplain functions and documenting that the proposed development will not result in “take” of any species listed as threatened or endangered under the Endangered Species Act (ESA).
    - If it is determined that the proposed project will impact any listed species or their habitat, the applicant shall provide a mitigation plan to achieve equivalent or greater biologic functions as those lost prior to development of the site.
  - Prior to final building inspection and approval, the applicant shall provide either a FEMA Elevation Certificate or a FEMA Floodproofing Certificate as appropriate, verifying that any structure built has been constructed and protected in accordance with the City’s floodplain regulations. If using the Elevation Certificate, the certificate shall be completed by a licensed surveyor. If using the Floodproofing Certificate, the certificate shall be completed by a registered professional engineer or architect. Either certificate shall be completed based on “Finished Construction” and submitted to the Engineering Services Manager.

- **CRITICAL AREAS:** The city sent the Anchor report to Confluence (city's review consultants) for peer review; that letter is forthcoming after the issuance of this Development Review Team letter. Confluence is coordinating with WSDOT regarding assessment of the WSDOT parcel to the east of your proposed development. The preliminary findings of Confluences review will include:
  - Confluences review preliminarily indicates off site wetlands on the WSDOT property which will impact the development envelope/footprint with application of a buffer onto the subject development site.
  - Confluences review preliminarily indicates the likelihood of on site areas meeting characteristics of wetlands that need further investigation.
  - Additional off site work to extend domestic water may impact wetlands and/or wetland buffers on the Carr and Asbjornsen properties.
  - Separate section must be added to the critical areas report also addressing habitat assessment requirements of PMC 21.07.050.
  - Other comments are forthcoming in the Confluence review letter, to be sent under a separate cover.
  - Once we are able to transmit the Confluence report, please review, conduct additional site investigation and revise critical area reports and respond. If impacts are proposed, resubmitted documents shall include a proposed compensatory mitigation plan.
  
- **CRITICAL AREAS:** Uses are still yet to be defined. The project is in direct proximity of two domestic water wells (Shenk business park and residential system to the west of Freeman Road and 50th). Please submit a critical aquifer recharge area report (CARA) to analyze potential impacts to water quality and supply. All reports must be consistent with PMC 21.06 Article XI, 21.06.1150 and .530. All reports must be authored by a qualified professional hydrogeologist.
- **CULTURAL RESOURCES:** See comments from Puyallup Tribe dated 12/23/21. Revisions to the site archeological report and additional site investigation is required to fulfill the Tribal requirements. The project is on Tribe reservation lands. Tribe staff comment:
 

“ESA's methodology looks good based on state guidelines however, for a project area on-reservation, 1/4 mile from the Puyallup River, containing two original allotments, with a high to very high probability for impacting cultural resources, Puyallup tribal guidelines require probes every 15 meters. Had adequate consultation taken place, we would have made the consultants aware that 30 meter spacing was insufficient.”
  
- **SITE PLAN:** Please provide updated easement showing Vector has access rights to establish ingress / egress onto the private 52nd Street. Public comments received by the city indicate the owners of the land underlying the easement do not believe the site has legal access to Freeman Road right of way from the private road. Since this will affect site layout and access to the site, city will need to verify proof of agreed upon easement access at that location.
- **SITE PLAN:** The prelim landscape plan sheets (L-1 and L-2) do not match the site plan sheet. Given the proposed street vacation application most closely resembles the site plan (sheets A1.1 OPT 2), Planning staff is reviewing A1.1 plans for consistency with code. Please see redline mark ups on plan set for further information
- **SITE PLAN:** Landscape perimeter buffering of 35' feet is required from the property line interior to the site development along the private 52nd Street roadway. The roadway abutment is a zoning adjoining line with a residential zone district, requiring a 35' buffer (PMC 20.35.035 (2)).
- **SITE PLAN:** The proposed alley along the western property edge of 0420201032 (Almont) must provide a 30' buffer between the proposed alley and the property line, which will move the alley alignment over to the west. The alley must be a public way to meet city standards and fire code. Fire Division may require a Fire turn around.

- **SITE PLAN - STREET VACATION AND NEW ROW:** The proposed new 50th Street / 21st Ave NW cannot be a partial ROW. Additionally, a new ROW must provide a 30' buffer interior to the ROW along the north edge of TPN 0420201036. See feedback Director Jeff Wilson provided on April 14, 2021 (email). None of the previous feedback was incorporated. See Traffic notes for more information. Planning does not support the street vacation and ROW relocation plan as presented.
- **SITE PLAN:** Building B is located too close to the new street right of way proposed; the site plan shows a 12' setback only. See PMC 20.35.023: "The maximum building height shall be equal to the proposed building setback within the first 35 feet of setback from an adjoining public street or residential zone. The maximum building height may be increased by one and one-half feet for each additional one foot of setback in excess of 35 feet up to the maximum permitted building height set forth in Table 20.35.020". The setback area shall be landscaped with a type I treatment.
- **DESIGN REVIEW:** 15' of landscape border along the north and south facing elevations (foundation line) of building A area required per 20.26.400.
- **LIGHTING:** All lighting shall conform to PMC 20.26.500. Please provide manufacturer data sheets for outdoor light fixtures with cut off shielding. Need photo metric plan set and technical sheets specifying cut off shielding facing residential zones. 20' height maximum for fixture poles. Photo metric plans shall show 0 foot candle light spill on adjacent residential properties. The heat diagram provided does not show foot candles. Please also demonstrate that glare will not be visible from any residential property (no LED diode shall be visible from adjacent properties and need to be sufficiently inset within the fixture and shielded as to cast lighting interior to the site).
- **LANDSCAPING:** 30' & 35' buffer areas along south and west side need to conform to PMC 20.26.500.
  - 30' buffer area shall include shrubs (3 gal min.) at 5' on center. Choose shrubs that will grow to 6' height at maturity. See PMC 20.26.500 (1)(b).
  - Conifer trees shall be used only, 8' tall at the time of planting, 15' on center.
  - An 8' opaque fence shall be provided interior to the buffer area and a sloped berm of 4' tall shall be provided, with a 4' retaining wall interior facing the site at the 30' buffer line shall be provided.
  - Provide an arborist report and tree protection plan with the civil plans.
- **LANDSCAPING:** Project must meet 10% interior paved area standard and comply with the Type IV parking lot landscaping standards. No more than eight (8) parking spaces shall be placed consecutively without a landscaping island, including truck trailer parking.
  - All perimeter landscape islands (defined as islands which project into parking lots from an area connected to a perimeter landscape yard) shall be a minimum of 12' wide with a minimum area of 200 sq ft of area.
  - All internal landscape islands (landscape islands entirely surrounded by paving) shall be a minimum of 15' in width with a minimum area of 500 sq ft.
  - 'Head-to-head' parking stalls and internal landscape islands shall be separated by a 'connector landscaping strip' a minimum of 6' in width
  - All internal landscape islands and connector strips shall include a single row of structural soil cells (EX. Silva cells, or equivalent) along the perimeter of all internal parking lot landscape islands where parking spaces are proposed (under the pavement directly abutting the outer edge of the landscape island, except in drive lanes)
  - All 'head-to-head' parking stalls internal to a parking lot shall have internal island 'end caps' to separate the parking stalls from abutting drive aisles. These 'end cap' islands shall follow the requirements for internal islands (size, dimensions, required landscaping, etc.).
- **LANDSCAPING:** A 30' buffer must be provided along the truck parking fronting onto Freeman Road west of Building B, per the Freeman Road overlay. Please revise.
- **LANDSCAPING:** A truck turn around appears to encroach in the 30' buffer on the west side of building B (west side).

**Engineering Review** - Jamie Carter; (253) 435-3616; JCarter@puyallupwa.gov

DRT Letter #1

February 17, 2022

Case P-21-0136

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- PRELIMINARY SITE PLAN – These corrections required to approve Preliminary Site Plan STORM
  - GENERAL - A stand-alone stormwater site plan is required for Preliminary Site Plan approval. The sheets submitted were buried within the Stormwater Report and were inadequate for this stage of design.
  - GENERAL – Overall the proposed stormwater design does not meet the level of intensity or complexity that reviewers would expect to see for a development of this size.
  - PAGE 38 of the SSP - A proposed development cannot create its own infeasibility. The SSP states that “Due to non-infiltrating soils, high groundwater, and a lack of flow space, no LID BMPs are deemed feasible.” The same report states, “the impervious cover after development will be approximately 84%.” If during civil design it is determined there is insufficient room for adequate stormwater facilities in the area, the area of the facilities shall be increased as necessary so that the final design will conform to City and State requirements.
  - Volume I, Section 2.5.5 of the 2014 SWMMWW refers to Table 2.5.1 for projects over 5 acres outside of the UGA. This table indicates that the LID performance standard and BMPT5.13 must be achieved.
  - The SWMMWW requires pre-developed and developed basin maps to estimate the quantity of water on site and determine where it goes. In addition, any discharge to private property requires documented easement rights, adequate conveyance capacity to the proposed offsite discharge locations and a complete downstream analysis to ensure there is no detrimental impact to existing property and/or drainage facilities. The current level of off-site analysis is inadequate even for the Preliminary Site Plan phase.
  - The proposal seeks to pump stormwater after the control structure. This is a highly complex operation and no one to date has been able to provide a design that shows that this type of scenario is feasible. The design would be required to match the flow curve of the outfall with pumps and provide pumping for overflow and emergency flows. Given the large amount of impervious area and the fluctuation that can create this would be an enormous task.
  - Geotechnical Report required. Infiltration feasibility/infeasibility and seasonal high groundwater are determined through in-situ testing of site soils and specific tests performed on site (see bullet #1 under Items Required for Civil Submittal - STORM).
  - PAGE 172 and 178 SSP/SWPPP: Both the north and south temporary ESC ponds show the mitigated higher than pre-developed. Clarify.
  - Per pre-application notes dated March 22, 2021: “Public right-of way runoff shall be detained and treated independently from proposed private stormwater facilities. This shall be accomplished by enlarging the private facilities to account for bypass runoff; providing separate publicly maintained storm facilities within a tract or dedicated right-of-way; or other methods as approved by the (Puyallup) City Engineer and the City of Fife.”



- CIVIL SUBMITTAL – These items required to be included in Civil Submittal  
STORM
  - Preliminary feasibility/infeasibility testing for infiltration facilities shall be in accordance with the site analysis requirements of the Ecology Manual, Volume I, Chapter 3, specifically:
    - Groundwater evaluation, either instantaneous (MRI-5) or continuous monitoring well (MRI-9) during the wet weather months (December 21 through April 1).
    - Hydraulic conductivity testing:
      - o If the development triggers Minimum Requirement #7 (flow control), if the site soils are consolidated, or is encumbered by a critical area a Small-Scale Pilot Infiltration Tests (PIT) during the wet weather months (December 21 through April 1) is required.
      - o If the development does not trigger Minimum Requirement #7, 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.
  - SSP – Vault dimensions used in modeling do not match dims on plans. Also, it appears that both vaults are being modeled as one. Unless all parameters are exact (orifice height, riser size, etc.) then vaults should be modeled independently.
  - Provide calculations and details to illustrate compliance with enhanced water quality standards. Consult SWMMWW Volume I, Minimum Requirement #6, and Volume 5 – Runoff Treatment.
  - If a project proposes to discharge to an adjacent wetland, the applicant shall provide a hydrologic analysis which ensures the wetland’s hydrologic condition, hydrophytic vegetation and substrate characteristics are maintained. See the SWMMWW minimum requirement #8.
  - The City has historical evidence of flooding at the project site, and as a result, any structures built on-site shall be flood protected to ensure the facilities are reasonably safe from flooding in accordance with PMC 21.07 – Flood Plain Regulations. The regulatory flood elevation governing protection shall be the Base Flood Elevation designated on the floodplain maps adopted by Pierce County.
  - Prior to final building inspection and approval, that applicant shall provide a FEMA Floodproofing Certificate as appropriate, verifying that any structure built has been constructed and protected in accordance with the City’s floodplain regulations.

#### WATER

- The client has provided draft easements for water main installation from the O’Reilly Auto Enterprises, LLC property and across the Carr Thomas J Trust. In order to complete the water main design and installation an additional easement between the Asbjornsen property and the City of Puyallup must also be drafted and recorded. Even though an easement exists between private property owners for access and utilities, the water main installed will be owned by the City of Puyallup and as such a 40-foot easement must be granted to the City for that portion of the proposed water main alignment for maintenance and repair.
- Hydraulic modeling analysis is required to size the necessary flows for fire suppression systems. The cost of this analysis is \$600 and is to be paid by applicant.

#### SEWER

- This property is currently over 300 feet from the City’s sanitary sewer system. The City’s Sanitary Sewer Comprehensive Plan indicates the need for new sewer infrastructure, including a publicly owned sewer pump station, to serve the project site and surrounding basin. Prior to granting sewer availability for the project the City must conduct an analysis of the basin to refine the sewer needs and improvements necessary to support the project and surrounding area. The basin analysis shall be conducted by a consultant selected by the City and any costs incurred shall be the responsibility of the applicant.

- o It is anticipated that the rough estimate of the study could cost approximately \$25,000 to \$35,000 and take up to 6 months to complete.
- At the conclusion of the sewer basin analysis, if the applicant elects to use the City's wastewater collection system, the applicant shall be responsible for the infrastructure upgrades to support the project including any oversizing necessary to support the tributary basin area. This may include the need for a public pump station. If a new pump station is required, the applicant shall be responsible to design and construct the facility to the requirements of the new basin analysis and City Standards.
- o The applicant may request a Latecomer's Agreement to seek reimbursement of infrastructure costs in accordance with PMC 14.20 and RCW 35.91.20.

#### STREETS

- Road and frontage improvements, including required right of way dedication shall be in accordance with the City of Fife's regulations.

#### **Fire Review** - David Drake; (253) 864-4171; DDrake@PuyallupWA.gov

- Based on City of Puyallup Municipal Codes fire sprinkler and fire alarm systems shall be required. The fire sprinkler system shall be designed and install per NFPA 13, 2016 Edition. The City of Puyallup Municipal Code requires the fire alarm system to be designed and installed to "Total Coverage" per NFPA 72, 2016 Edition. A UL Certificate shall be required on the fire alarm system. A Water Availability/ Fire flow Letter shall be required. Structures requiring more than 2500 GPM require the fire mains to be looped. Show Riser Rooms, FDC's, P.I.V's, and all Fire Hydrants on site plan. Fire hydrants to reach all points of the structure within 400'. Fire Hydrants shall be at least 50' from the structure and the FDC supporting the fire sprinkler system shall be no closer than 10' and no greater than 15' from the hydrant. 26' wide required in front of fire hydrants. Do not block FDC's, P.I.V's, and all Fire Hydrants with a parking stall. All must be placed in parking islands away from building. Frontage on Freeman Rd will require Fire Hydrants. The fire access road (lane) shall be a minimum of 26'. Provide all site plan dimensions. At this time the 2018 IFC and referenced standards shall be utilized. The entrances shall meet ladder truck fire apparatus truck turning radiuses and approval of the angle of inclination. Auto-turn or equivalent program required to demonstrate fire apparatus turning radiuses. Maximum road grade shall be 10%. The Length of building A westside, has no path for Exiting the building at all required Exits. Southwest Trailer parking lot (32) will be required to meet 2018 IFC Appendix D turn-around dimensions. Show on site plan. Provide more detail on 20' private alley with dimensions around it. Fire lane / Street between Bld A and Bld B, provide more clarification for access. Dimensions, sidewalks, lanes, and intersection to enter the complex. This is not a full review. More information is required to complete.

#### **Traffic Review** - Bryan Roberts; (253) 841-5542; broberts@PuyallupWA.gov

- Off-site paved transitions required
- Minimum commercial driveway requires 30ft width with 35ft radius. Actual design based on WB-67 AutoTurn. Trucks will not be allowed to encroach into adjacent vehicle lanes.
- paved roadway along frontage not wide enough for center TWLTL as required per City Standards. Fife standards require minimum 36ft wide roadway

- Show improvements for 48th St E. Pavement analysis will evaluate existing pavement condition and identify mitigation
- Per Fife standards, back of sidewalk shall be placed at ROW (35ft from centerline)
- 5.5ft is shown between back of sidewalk and ROW. Typically, the back of sidewalk is at the edge of ROW (35ft from centerline in this case). Verify the correct dimension with the City of Fife
- 30ft ROW does not meet COP standards. Must be 60ft minimum
- Driveways need to meet commercial driveway standards
- Dead End City Standard Street into a parking lot?
- 26ft Roadway width does not meet commercial roadway standards
- Show roadway improvements south of here. Per City of Fife, the road section may be reduced to two-14 ft. lanes south of the project frontage to Levee Rd. Streetlights are required
- Show roadway improvements on 19th Ave NW
- Driveways need to meet commercial driveway standards
- Per City standards, must provide curb/gutter/sidewalks/planter strips/streetlights.
- Provide details on physical access restriction along Freeman Rd
- Curb alignment must remain constant
- Need to show EV access possible
- Fire turnaround at end of ROW? Check with David Drake (Fire) for compliance with Code. What if lots are gated in the future?
- Access design is not feasible, additional ROW necessary. Redesign access using AutoTurn. Show simultaneous inbound/outbound WB-67 trucks maneuvering this intersection. Trucks will not be allowed to encroach into adjacent vehicle lanes. Additional ROW required
- Per the City of Fife, a three-lane section will be required along the length of the project frontage. Additional ROW necessary (~20ft) to build necessary roadway widening + frontage improvements (including streetlights)
- ESD + SSD sight distance analysis required at this driveaway
- Show modifications at Levee/Freeman intersection to accommodate simultaneous inbound/outbound WB-67 trucks. Turn pockets required on Levee & Freeman Rd. Sight distance analysis required per City standards. Include streetlight design at intersection, ensure placements are protected from trailer off-tracking conflicts
- ESD + SSD sight distance analysis required at this driveaway
- Provide details on physical access restriction along Freeman Rd
- 50th St E/21st Ave NW must be aligned on either side of Freeman Rd
- Provide details on physical access restriction along Freeman Rd
- 52th St E/19th Ave NW must be aligned on either side of Freeman Rd
- ESD + SSD sight distance analysis required at this driveaway
- Driveways need to meet commercial driveway standards
- Driveways need to meet commercial driveway standards

- Traffic Comments

Preliminary Site Plan Comments:

- See site plan REDLINES for more detail

- ROW Vacation & Dedication:

- o Please reference Jeff Wilson's 4/14/21 email regarding ROW dedication.
- o Please reference Ken Cook's 1/13/22 email regarding Street Vacation Application R-21-0013

- AutoTurn Analysis:

- o In addition to on-site circulation analysis, turning analysis required at site driveways and adjacent intersections. Assume WB-67 truck and fire apparatus.
- o Shall include Levee Rd/Freeman Rd
- o Trucks will not be allowed to encroach into adjacent vehicle lanes or roadway shoulders

- Identify required ROW acquisitions to meet roadway geometry requirements.

- o Show roadway widening along the project frontage on Freeman Rd and extending to Levee Rd. A three-lane section will be required along the length of the project frontage, including TPN that separate the project site frontage (TPN 0420201036 , 0420205004) and the Tribal Trust property at TPN 0420174032. The road section may be reduced to two-14 ft. lanes south of the project frontage to Levee Rd, excluding required turn pocket(s) at Levee Rd.

- Physical deterrents will be required to channelize outbound heavy vehicles to utilize the southern section of Freeman Rd. Provide details on how proposed physical deterrents will safely restrict access. Use of tenant lease agreements will not suffice or be accepted.

- Physical deterrents will be considered at Freeman Rd and Valley Ave to preclude semi-trucks from traveling south on Freeman Rd from Valley Ave to the development site.

- Physical deterrents will be considered at Freeman Rd and 48th St to preclude semi-trucks from traveling to or from the development site on 48th St.

- City roadway/geometric standards must be met by proposed improvements.

- o Roadway widening with a center turn lane is Fife's standard street section for Freeman Rd and is necessary to safely accommodate industrial/commercial traffic.
- o Intersection/driveway spacing standards must be met with current design layout
- o Per City standards, driveways/intersections must be aligned across the street. Offset alignments are not acceptable.

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

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

- Any required improvements must meet Union Pacific design requirements.

- Sight distance analysis required at site access + adjacent intersections per City standards (not AASHTO)

- o Report the available sight distance.
- o Include photo documentation with sight distance analysis
- o Sight distance analysis required per City standards at Levee/Freeman.

- Show modifications at Levee/Freeman intersection to accommodate simultaneous inbound/outbound WB-67 trucks. Turn pockets are required on Levee & Freeman Rd. Include streetlight design at intersection, ensure placements are protected from trailer off-tracking conflicts

- Show roadway improvements on Freeman Road (between project and Levee Rd). Per City of Fife,

the road section may be reduced to two-14 ft. lanes south of the project frontage to Levee Rd.

- Show preliminary location of City standard streetlights. Lighting must be provided on Freeman Rd extending to Levee Rd.
- Guardrail analysis required on steep roadside sections of Freeman Rd and Levee Rd
- Show improvements to 48th St E
- 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
- Park impact fee was established by Ordinance 3142 dated July 3, 2017 and shall be charged \$0.87 per sqft of building space.
- 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.
  - o As part of these improvements, additional right-of-way (ROW) may need to be dedicated to the City.
- At the time of civil permit review provide a separate street lighting plan and pavement striping plan (channelization) sheet for the City to review.

Traffic Scoping comments:

- Updated scoping worksheet required. Previous draft scoping document has not been approved by Puyallup or Fife. The scoping document will dictate the specifics of the Traffic Impact Analysis (TIA) study – without agreement on the scoping worksheet, the presently submitted TIA is entirely incorrect and must be reconducted after receiving concurrence from the Agencies involved.
  - o Per previous comment responses, future tenant has not been identified at this time. Therefore, trip generation needs to demonstrate worst-case scenario land use to accurately capture possible traffic impacts particularly if no end user or use is specified and there is no known mechanism to constrain land uses. For warehouse projects with no end user or uses, the City of Puyallup has been using the ITE land use code 155, high cube fulfillment center (Sort), for the purposes of assessment of traffic impacts for warehouse development projects.
    - o Provide details on how heavy vehicle % was generated.
    - o Update trip distribution & assignment based on previous comments. Please estimate project splits north/south on Freeman, as well as on 48th.
    - o Based on updated trip generation assumptions, provide an updated list of study intersection to be evaluated during the AM/PM peak hour (based on Fife threshold)
    - o Once additional study intersections are identified based on the updated trip generation assumptions, all intersections must be counted at the same time. Older traffic counts will not be accepted.
    - o The 11th edition of the ITE trip generation manual shall be used for trip generation assumptions.
- Once the scoping document has been approved by Fife & Puyallup, the applicant shall distribute the scoping document to other local agencies & jurisdictions for review (including Union Pacific, Puyallup Tribe of Indians, WSDOT)

TIA Scope requirements:

TIA analysis:

- Report AM/PM peak hour delay, level of service (LOS), segment V/C ratios, queues (average, 95th),

by each lane movement.

- o Verify the proposed queue capacity at adjacent intersections will accommodate future demand.
- o Identify off-site mitigation as necessary.
- o Assess traffic impacts at identified intersections consistent with Fife LOS standards for Fife controlled ROW and Puyallup LOS standards for Puyallup controlled ROW.

- Assess existing conditions and document future plans for the Transit Facilities, Railroad Crossing/Operations, and Non-Motorized Facilities.
- Detailed explanation for growth rate assumptions. Typically, short term growth should be assumed at 3% annual growth.
- Channelization warrants for left turn pockets are not necessary in TIA. Center TWLTL and left turn pockets are required per City roadway standards and will be a condition of approval.
- It is not uncommon for the adjacent Union Pacific trains to operate during peak times causing significant delays at the existing at-grade rail crossing. Traffic analysis must assume multiple blocking events during AM/PM peak to simulate worst case scenario.
- The TIA must address how project trip distribution impacts related to Canyon Rd & SR167 build outs.
  - o Future baseline/build conditions should not assume these projects are completed when evaluating operational impacts caused by this project.

Traffic Safety Analysis:

- Intersection vehicle crash rates at all study intersections (5 years).
- Include crash severity and types.
- Potential countermeasure assessment.

Pavement analysis:

- Pavement analysis needs to be provided per annexation SEPA conditions.
- Heavy vehicles generated by this project will have a significant impact on Puyallup and Fife roads, including capacity, intersection level of service, impacts to the pavement surfacing, etc.
- Once the traffic scoping worksheet is updated, coordinate with Puyallup & Fife on which roadways should be included in analysis.
- Assess condition of existing pavement, identify current pavement structure. At a minimum, pavement analysis needs to include impacted roadways, including Freeman Road, 48th Street and Levee Road. Please specify locations for Fife & Puyallup review prior to conducting field assessment. Collect field samples and analyze existing pavement. Collect photo documentation of the existing pavement conditions.
- Perform pavement analysis to determine expected terminal serviceability of pavement with and without project.
- Identify needs for any roadway reconstruction or asphalt overlay in order to maintain adequate serviceability period.
- Provide a narrative on how heavy vehicles inflict pavement damage compared to passenger cars, and how this can be mitigated.

Comments from Puyallup Tribe of Indians staff

Scoping comments:

- 48th St E is not built to sustain truck traffic in its current form. Please consider restricting freight trucks down this road in order to protect the residential character of the housing in Fife that includes Tribal residential uses.

- Traffic generation and the onsite noise of the facility should be accompanied by a noise/light berm similar to the Prologis project in Tacoma/Fife to mitigate impact to residential uses.
- 19th Ave NE (Applicant has it 52nd St E) I believe is a restricted private drive. What percent of trucks will use this drive and has the applicant secured access to this drive by the appropriate parties?
- What street improvement assumptions are proposed under traffic scoping to model these trips? (Freeman road expansion, turn lanes, culvert replacement, complete streets, other road improvements) Current road facility cannot support this level of heavy haul traffic as per Fife Municipal Code Chapter 10.44. Keeping in mind Tribal properties in the vicinity, what is proposed to be the new alignment of Freeman Road?
- What minimum offsite traffic improvements will be necessary for the applicant to contribute to, to be approved for proposed use?

## TIA

1. I find the TIA to not adequately address the Union Pacific Railroad Crossing. A 5 hour observation without a demonstrable train event is inadequate for the conclusion derived in the TIA.

"Video of the Union Pacific Railroad crossing south of Valley Avenue was observed for 5 hours during peak travel periods (6-9 AM and 4-6 PM). During those 5 hours of video no trains were observed and no gate closings occurred. Therefore, the rail crossing does not appear to significantly affect operations of the Freeman Road and Valley Avenue signal during the AM or PM peak hours." -Pg 24 TIA

2. The TIA safety analysis doesn't model properly for the truck trips generated by the project. Freeman @ Valley has had 10 collisions in the sample date, which I think it significant for the intersection. Freeman @ Valley currently restricts heavy haul traffic and contains the rail crossing 200 feet back. I feel like a more significant analysis including the newly introduced truck traffic queuing at Valley and the cargo lengths of trucks should be studied so that trucks are properly clearing the railroad tracks.

3. I cannot agree with the conclusions stated in the Channelization Warrants (7.2). I don't believe proper turn radii from the development provides that Freeman as a 2 lane, non-heavy haul corridor can accept truck traffic introduced by the project. The warrants state that no center turn lane is needed, which would mean likely trucks would be turning into oncoming traffic when making right hand turns out of their facility. It is my understanding that the ROW is roughly 20-ish feet and these types of trucks will require a minimum 27 feet to make a 90 degree turn. These turn radii should be modeled.

4. In the Channelization Warrants (7.2), the applicant consultant claims state that there is no responsibility for widening ROW due to the project. I am confused of this statement because of previous public statements made at the Community Meeting hosted by the Vector where the claim was that Vector had responsibility to widen the frontage of the project site. In any case, I disagree with both statements as the type of traffic, the road construction type, turning radii, and safety concerns warrant that without a full length of road improvement to either Levee Rd or Valley Ave, there would be concerns that the current road would fail under the weight of the trucks, cause undue safety concerns of the turning radii of trucks, and safety concerns of the Union Pacific rail road crossing due to truck queuing at Valley. I believe the entirety of section of road should be a minimum requirement to introducing this type of traffic onto Freeman Rd to properly mitigate safety and traffic concerns.

**Building Review** - David Leahy; (253) 435-3618; DLeahy@PuyallupWA.gov

- 1.Plans need to be complete with all building, plumbing, mechanical, energy code, accessibility requirements clearly addressed per the Codes in place at the time of complete submittals.
- 2.Need to provide a Geo-Tech report for the building site area.
- 3.For office areas must provide details on the required charging stations per IBC section 429 of the Washington State amendments on the plans.

## Resubmittals:

Please visit <https://permits.puyallupwa.gov/Portal> to register for an account and view the status of your permit.

All permit resubmittals must come in through the City's new online permit system at <https://permits.puyallupwa.gov/portal/>. Applicants will need to create a portal account in order to resubmit. Once you have signed up for an account, if you do not see your permit listed in your account, contact the permit center. To resubmit follow the steps below:

- Sign in to your portal account
- Find this permit by clicking on the 'Application Search' tool under the 'Planning Division' section of the Cityview Portal webpage. Search for permit in the search bar by using the permit number, site address, or parcel number.
- Select the project from the resulting list by clicking on the link 'Planning Status'.
- Scroll to the bottom of the portal page to the "Upload Documents" section to resubmit documents.
- Click the "click here" button to be taken to the submittals page.
- In the list of submittal items, upload a "new version" of each document for which you have made revisions.
- If you are submitting a new document for which there is not a previous version, click the button under the heading "Upload Additional Documents".

The electronic submittal must contain the entire permit resubmittal package including all attachments and a response letter fully responding to all the "Action Items", as outlined above.

Sincerely,

Chris Beale  
Senior Planner  
(253) 841-5418  
CBeale@PuyallupWA.gov