



October 18, 2022

Chris Beale
Senior Planner
City of Puyallup
Planning Division
333 S Meridian
Puyallup, WA 98371

RE: **Responses to DRT – Letter 1**
Freeman Logistics
NEC – 82nd Avenue East (Freeman Road) and 19th Avenue Northwest, Puyallup, Washington
Permit No. P-21-0136

Dear Chris:

We have revised the plans and technical documents for the above-referenced project in accordance with your DRT comment letter dated February 17, 2022. In addition, since the date of the City's comment letter, Vector has acquired two additional parcels into the Project Site. The acquisition of these parcels renders some of the City's comment moot, as noted below.

Below are responses to each comment received to assist in your review and approval of our resubmitted materials.

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 1.1]

Response: Some preliminary explanation for both this comment response and many of the other comment responses will be helpful in establishing our reasoning. To determine the appropriate setbacks and buffers in all locations of the project sites, we have begun by referencing chapter 20.54 of the Puyallup Municipal Code: Freeman Road Overlay Zone. 20.54.020(2) states:

"Properties that abut Freeman Rd E, which interface with Tribal Trust Land or residential zones in the city of Fife, shall comply with the zone transition standards of PMC 20.26.500 and the city's Type I landscaping standards, including earthen berm, of the vegetation management standards (VMS). The zone transition standards of PMC 20.26.500 and Type I landscaping standards shall also apply when nonresidential uses are proposed on a property sharing a common boundary with existing residential uses. For the purposes of applying PMC 20.26.500 to the subject properties, the interface with any Tribal Trust Land or MDR (medium density residential) zoning in the city of Fife, or abutting properties containing existing residential uses, shall be considered a "residential zone" or a "RS zone" as referenced in PMC 20.26.500. (Ord. 3227 § 1, 2021)."

The Freeman Overlay Zoning codes (which reference PMC 20.26.500) govern over the more general regulations in PMC 20.35.035(2).

Moving on to this comment, we referenced PMC 20.26.500 as required by the Freeman Road Overlay Zone. 20.26.500(1) states "When a street or alley separates a nonresidential zone from a residential zone, this landscape buffer may be reduced to 12 feet in width and a six-foot masonry or wood opaque fence shall be provided at either edge of the landscape buffer." The code does not state that this street or alley must be a ROW; the code defines "alley" to include "City-approved private way." See PMC 20.15.005. A private road such as 19th Ave NW (eg 52nd St) clearly fits the code parameters as stated.

In discussions with Puyallup planners, some disagreement has been expressed as to the applicability of this code, but also openness to leniency in allowing 12' of landscaping buffer and a wood fence. Directly to the South of the site, the residentially zoned site is a wetland and will not be able to be developed, so there are no residents there to screen the site from.

Another item which may be worthy of note is that the requirement for 30' landscape buffers where this industrial property directly abuts residential properties comes from the same code section we are citing for the 12' landscape buffer where the industrial project and residential properties are separated by an intervening ROW. Elsewhere in these Planning comments, this code section (20.26.500) is referenced as being the correct one to use for the 30' landscape buffer requirement. So it would follow that the 12' buffer requirement is also the correct code section to use.

- *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 a1.1]*

Response: The acquisition of the Asbjornsen parcels has obviated the need for an extension of 21st Ave NW. Instead of an extension to 21st Ave NW, the project now proposes to retain 22nd Ave NW (eg 49th St E). There is no longer an alley proposed along the western side of 0420201032, but a 30' landscape buffer is provided wherever this property borders the Project. The current 22nd Ave NW ROW does not have a fire turn-around at the dead end, but with the proposed site entrances in this project, a hammerhead turn around can be achieved.

- *Off site wetland on WSDOT property [site plan sheet a1.1]*

Response: Preliminary information is included in the Critical Area Report (CAR) on critical areas present on the WSDOT right-of-way based on draft documentation prepared by WSDOT and their consultant. WSDOT is working with WDFW to conduct a critical areas assessment on parcel numbers 0420201110 and 0420201111. Once the findings of WSDOT/WDFW are finalized and shared with Anchor QEA, they will be incorporated into the final Freeman Logistics Critical Area Report (CAR). This will include all determinations of offsite wetlands, streams, and associated buffers.

- *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 a1.1]*

Response: Comment no longer applicable as an extension for 21st Ave NW is no longer proposed.

- *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 A1.1]*

Response: As outlined in the response to the first Planning comment, we are referencing PMC 20.26.500 first for all setbacks and buffers. Under this code section, (6) does require a very similar building height setback to 20.35.023. But in any case, we have changed the site layout so that the North side of Building B is 82'-6" from the intra-site ROW – so it unquestionably meets both codes. Neither code section says that type I landscape treatments must be provided within height setbacks – although they are in most locations due to other requirements.

- *DESIGN REVIEW: 15' of landscape border along the north and south facing elevations (foundation line) of building A area required. [site plan sheet A1.1]*

Response: A 15' landscape border is provided in the revised plan along the South side of Building A. On the North side of Building A we have a conflict. A minimum of 25% of the building perimeter is required to have a fire aerial apparatus access road. There must be an aerial apparatus access road along the North side of the building to reach the 25% minimum.

Additionally, to provide the minimum number of parking stalls required by code we must have parking along the North side of the building. Parking stalls are required to be 20' deep.

Aerial apparatus roads must be a maximum of 30' from the building. If we provide this maximum distance of 30' and subtract the 20' for parking stalls, all that remains for landscaping is 10'. This 10' is provided; within the 10' we can provide the same number of plantings.

- *DESIGN REVIEW: 15' of landscape border along the north and south facing elevations (foundation line) of building A area required. [site plan sheet A1.1]*

Response: This is a duplicate comment to the one directly above but perhaps it was meant to refer to Building B instead? If so, the response is fairly similar to Building A – 15' of foundation landscaping is provided along the South elevation. Along the North elevation we have the same conflict between Fire requirements for aerial apparatus access, parking requirements and landscaping requirements. In this location we were able to provide compact parking, which makes the foundation landscaping a full 13' deep.

- *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 A1.1]*

Response: There is no longer trailer storage nor truck parking along Freeman Road.

- *LANDSCAPING: A truck turnaround appears to encroach in the 30' buffer on the west side of building B (west side). [site plan sheet A1.1]*

Response: The site plan has been revised and this situation no longer occurs.

- *Truck stalls must contain a landscape break every 8 stalls in accordance with type IV standards [site plan sheet a1.1]*

Response: There may be some misunderstanding as to the proposed function of these areas. They are not for vehicle parking, but long term storage of trailers (not trucks). So the landscape requirements would be per 20.35.035(3)a which addresses screening of outdoor storage. However, even if these areas were to be used by trucks, PMC 20.35.035(15) states "Truck parking... shall be considered a form of outdoor storage." This same code section states that these areas only require screening per 20.35.035(3)a – which is provided by the landscape buffers along the property lines. Therefore, whether these areas are for trailer storage (which is the intention) or truck parking, the code requirements are the same and do not involve landscape breaks.

- *Truck stalls must contain a landscape break every 8 stalls in accordance with type IV standards [site plan sheet a1.1]*

Response: This is a duplicate comment to the one directly above.

- *SEPA Review: Please review all comment documents and correspondence posted to the Cityview portal regarding your application. Please review and provide responses.*

Portal Upload Date	Commenter	Response
2/9/2022	City of Fife: Greg Vigoren	Flow control, water quality, and oxbow wetland level analysis are provided.
2/9/2022	PSE: Jeffrey Payne	Noted electrical and gas service locations.
2/9/2022	CDSPS: Brian T Comfort	The waterline routing has been revised to avoid the Asbjornsen property.
2/9/2022	ECY: SW Region	Noted-state permits will be obtained as needed.
2/9/2022	Absjorsen SEPA & Site Plan Feedback	See new site plans for revised access and landscaping design. See revised reports for critical areas, habitat, traffic and storm water details.
2/9/2022	Squaxin Island Tribe: Shaun Dinubilo	A Cultural Resource study has been provided.
2/9/2022	Pierce County Traffic: Brian Churchill	Noted. See revised TIA.
2/9/2022	Puyallup Tribe: Andrew Strobel	Noted. See revised TIA.
2/9/2022	Puyallup Tribe: Jennifer Keating	Noted, see Cultural Resource study.

2/15/2022	Puyallup Tribe: Andrew Strobel	Noted. See downstream analysis and flow control analysis in the Stormwater Site Plan.
2/15/2022	City of Puyallup: Jeffrey Wilson	Noted. See revised site plan and TIA
2/16/2022	City of Puyallup & City of Fife	Co-lead SEPA agency noted. See revised plans, reports and studies for documentation that the proposed project does not have any significant adverse environmental impacts.

- *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*

Response: Comment Acknowledged. The revised plans and comment responses herein address the project impacts identified in the first round of SEPA review.

- *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.*

Response: Comment Acknowledged. Additional scoping discussions were had and the analysis in the updated TIA addresses the comments.

- *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.*

Response: The sanitary sewer system includes a private sewer lift station located onsite which routes sewer via force main through on offsite private easement extending to the southeast. The force main will connect to public City of Puyallup sewer at Industrial Parkway.

- **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.

Response: The plan includes extension of Puyallup water main from the O'Reilly property, across the Carr and Shenk properties and then onto the SE site corner. Negotiations are ongoing.

- **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.

Response: Stormwater code requires our site to maintain the natural discharge location. The ditch in question conveys across the Tribe land and is the existing and natural outlet of the site. The provided flow control is designed to reduce flow rates through the ditch by providing duration plus 100-yr peak flow matching. Additionally, a no-rise analysis is provided for the oxbow wetland downstream.

- **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.

Response: The project has been designed to provide compensatory flood storage volume to avoid raising the BFE. Additionally, building floor elevations are located at least 1-ft above the highest reported BFE within the building footprint. The BFE information is per Pierce County records.

- *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.*

Response: The proposal includes 1:1 compensatory storage. See the flood plain analysis. Additionally, habitat assessment has been performed see the Critical Area Report.

- *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.*

Response: The proposal grading is designed to meet the requirements of a FEMA Elevation Certificate. This certificate will be completed by a PLS during the final stages of the project as required.

- *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.*

Response: Preliminary information is included in the Critical Area Report (CAR) on critical areas present on the WSDOT right-of-way based on draft documentation prepared by WSDOT and their consultant. WSDOT is working with WDFW to conduct a critical areas assessment on parcel numbers 0420201110 and 0420201111. Once the findings of WSDOT/WDFW are finalized and shared with Anchor QEA, they will be incorporated into the final Freeman Logistics

Critical Area Report (CAR). This will include all determinations of offsite wetlands, streams, and associated buffers.

- *Confluences review preliminarily indicates the likelihood of on site areas meeting characteristics of wetlands that need further investigation.*

Response: A rationale for considering this on-site disturbed area located at the east side of parcel number 0420174075 as an artificial wetland is provided in Section 3.2. A delineation of the artificial Wetland B was provided during Anchor QEA's March 2022 field investigation.

- *Additional off-site work to extend domestic water may impact wetlands and/or wetland buffers on the Carr and Asbjornsen properties.*

Response: Unavoidable temporary impacts to offsite Wetland A buffers will occur as part of the work to extend the utilities at the offsite easement located south of 19th Avenue NW. Construction stormwater BMPs following The Pierce County Stormwater Management and Site Development Manual will be utilized to eliminate any impacts to Wetland A.

- *Separate section must be added to the critical areas report also addressing habitat assessment requirements of PMC 21.07.050.*

Response: A Special Flood Hazard Areas Habitat Assessment is provided in Section 5.3 of the revised CAR.

- *Other comments are forthcoming in the Confluence review letter, to be sent under a separate cover.*

Response: Anchor QEA has provided responses to all available comments made by Confluence and revised the CAR to reflect this feedback. A detailed stand-alone comment response document addressing all comments made in the March 4, 2022 CEC memo will also be provided.

- *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.*

Response: See the updated report by Anchor QEA.

- *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.*

Response: See the CARA prepared by Terra Associates, Inc. dated September 12, 2022.

- *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.”

Response: After receiving the comments from the Puyallup Tribe of Indians an updated cultural resources assessment was conducted utilizing the requested 15 meter interval spacing for subsurface survey. The cultural resources consultant, Environmental Science Associates, confirmed with the Puyallup Tribe of Indians that 15 meter interval spacing, excluding the footprint of existing infrastructure such as buildings, roads and utilities, was a sufficient survey density. The Tribe confirmed on 3/15/2022 that this was a sufficient effort. The additional survey resulted in an additional 206 probes, for a total of 275 across the Project Area. No potential cultural resources were identified during the additional survey, and the results were consistent with the previous investigations. No additional cultural resources work is recommended as a part of the Project. The updated report was submitted to the Washington State Department of Archaeology and historic Preservation (DAHP) and the Puyallup Tribe of Indians on 5/19/2022. No response has been received to date.

- *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.*

Response: Vector has verified that we are not able to access the Project by way of 19th Ave NW, and so the project no longer includes any driveways from or interaction with this private ROW.

- *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*

Response: Planning comments from A1.1 were addressed above. Landscape plans have been updated so that they match architectural and engineering plans.

- *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)).*

Response: This is a duplicate comment to the very first comment in the letter.

- *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.

Response: The alley has been removed from the project and the 30' buffer is now provided.

- *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.*

Response: We no longer propose a partial ROW nor a new 21st Ave NW. Instead, we plan to improve 22nd Ave NW, vacating and dedicating ROW as necessary. It appears that the 30' landscape buffer required previously was due to there being a residential site to the South of the Building A site. Vector has been able to acquire this property and so on both sides of 22nd Ave NW industrial properties facing each other. Neither PMC 20.26.400 nor 20.26.500 require a landscape buffer in this situation, beyond the minimum landscape buffer along any property line of 6'. The plan has been updated to include this 6' buffer.

- *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.*

Response: This is a duplicate comment.

- *DESIGN REVIEW: 15' of landscape border along the north and south facing elevations (foundationline) of building A area required per 20.26.400.*

Response: This is a duplicate comment.

- *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).*

Response: A photometric lighting plan with fixture types is included in the revised plans.

- *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.*

Response: Noted, with some specific follow up comments: 30' buffer areas per PMC 20.26.500 (1)(b) are shown as noted in the code. We have verified with Chris Beale that the retaining wall to the side of the berm is not a code requirement, but is a suggestion based on other recent industrial projects. The civil engineering team has evaluated the conditions around the berms, specifically the slopes, and determined that maintaining the berm peaks in the center of the berm poses no issues. Therefore, berms have been added to the site plan as required, but no retaining walls. As to the height of the fence, both PMC 20.26.500(1)(c) and section 14.1 type 1a of the visual barriers in the Puyallup VMS call for a 6' opaque wood fence, not an 8' fence. We are showing this between all 12' and 30' buffers and the project site. And as to the "35' buffer areas along the south", the code section cited in this comment (PMC 20.26.500(1)) calls for a 12' landscape buffer "when a street or alley separates a nonresidential zone from a residential zone". See our response to the very first Planning comment for more on this item. An arborist report and tree protection plan have been commissioned and approval should be a condition of approval for development permits.

- *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.).*

Response: All landscape islands meet these requirements. Parking landscape calculations per sheet L-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.*

Response: This is a duplicate to another comment above; note that this condition no longer occurs.

- *LANDSCAPING: A truck turn around appears to encroach in the 30' buffer on the west side of building B (west side).*

Response: This is a duplicate to another comment above; note that this condition no longer occurs.

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

- *PRELIMINARY SITE PLAN – These corrections required to approve Preliminary Site Plan STORM*

Response: Acknowledged.

- *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.*

Response: The preliminary plans include Stormwater sheets.

- *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.*

Response: The preliminary stormwater design has been revised to include additional information both on the plans and report.

- *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.*

Response: Feasibility of BMPs has been clarified in the revised stormwater site plan.

- *Volume 1, 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.*

Response: The project is within the UGA. This comment is not applicable.

- *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.*

Response: Basin maps have been revised. The upstream/downstream investigation has also been revised.

- *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.*

Response: The proposal includes traditional gravity control structures at the detention vault outlet(s), followed by gravity conveyance to a lift station. The lift station will include a pressure transducer and variable speed pumps which will closely maintain the water level in the wet well such that the gravity control structure at the vault is not backwatered. Force mains will convey flows from the wet well to the NW site corner and then discharge to a gravity conveyance system connecting to the existing downstream channel. We believe this system provides nearly identical flow characteristics at the downstream point of compliance versus the flow control standard. Emergency backup power is proposed. A gravity overflow line is also proposed in the event of total system failure.

- *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).*

Response: The site is underlain by alluvial silts and sands which are known for not supporting infiltration due to the discontinuous, fully inundated sand layers and fine-grained silt layers. Seasonal high groundwater is around 5 feet below current site grades. The upper five feet of soil at the site consists of silty sand and silt which have between 25 and 70 percent passing the no. 200 sieve. This fine-grained material will impede the downward migration of any stormwater which would restrict the sites' ability to infiltrate stormwater.

- *PAGE 172 and 178 SSP/SWPPP: Both the north and south temporary ESC ponds show the mitigated higher than pre-developed. Clarify.*

Response: The reports referenced are used only to generate Q_2 or Q_{10} flows which are then used to size the pond based on surface area (SF) = Q (CFS) x 2,080. The ESC ponds are not intended to meet any flow or duration matching scheme. They are strictly sized per the manual.

- *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."*

Response: For the preliminary design of frontage along the project site, the concept is to combine public and private flows into combined facility(s) and have a maintenance agreement with the city. If during the course of design review, either Puyallup or Fife is not agreeable to this arrangement, separate facilities can be accommodated within the newly dedicated ROW along the east side of Freeman Rd. A separate stormwater facility is proposed for public improvements south of the site.

- **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 (MR1-5) or continuous monitoring well (MR1-9) 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.*

Response: The site soils do not support the use of infiltration facilities and the seasonal high groundwater table is approximately 5 feet below current site grades. Therefore, as the site meets the infeasibility requirements from the Department of Ecology Manual, the additional testing is not required.

- *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.*

Response: Vault modeling has been revised.

- *Provide calculations and details to illustrate compliance with enhanced water quality standards. Consult SWMMWW Volume 1, Minimum Requirement #6, and Volume 5 – Runoff Treatment.*

Response: Flow rates and approximate vault sizes are provided at this stage of design. More detailed design including verification by the manufacturer will be included during permit plan preparation.

- *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.*

Response: Direct discharge to a wetland is not proposed.

- *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.*

Response: The current design includes elevation of the building finished floors to 1-ft above the highest adjacent BFE per Pierce County data.

- *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.*

Response: The proposal grading is designed to meet the requirements of a FEMA Elevation Certificate. This certificate will be completed by a PLS during the final stages of the project as required.

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.*

Response: The water main alignment has been revised to avoid crossing the Asbjornsen property.

- *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.*

Response: Acknowledged. Fire flow sizing to be included as part of the site development construction permits.

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.*

Response: This topic has been further discussed with Jamie Carter. The proposed private routing and maintenance of sewer will be considered by the City.

- *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.*

Response: We do not anticipate a public lift station is required for this development. The proposed private lift station will be sized to accommodate the subject property and several surrounding properties which are currently unsewered. There does not appear to be significant expansion potential beyond the project site.

STREETS

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

Response: Acknowledged.

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 installed 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.

Response: Acknowledged. Fire sprinkler design will be handled during future stages of design.

A UL Certificate shall be required on the fire alarm system. A Water Availability/ Fire flow Letter shall be required.

Response: Acknowledged. Fire sprinkler design will be handled during future stages of design. The water availability letter is pending flow modeling by the city.

Structures requiring more than 2500 GPM require the fire mains to be looped.

Response: A loop is provided around each building.

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'.

Response: These items have been added to the water plan.

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.

Response: The above requirements have been incorporated.

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.

Response: These requirements have been met with the revised site plan.

Frontage on Freeman Rd will require Fire Hydrants. The fire access road (lane) shall be a minimum of 26'. Provide all site plan dimensions.

Response: Fire hydrants have been added to Freeman Rd. All fire access lanes have been designed at 26' or more width. Site plan dimensions are included.

At this time the 2018 IFC and referenced standards shall be utilized.

Response: Acknowledged.

The entrances shall meet ladder truck fire apparatus truck turning radiuses and approval of the angle of inclination.

Response: Noted.

Auto-turn or equivalent program required to demonstrate fire apparatus turning radiuses. Maximum road grade shall be 10%.

Response: All turn radiuses for on site driveways are 28' per 2018 IBC. Demonstrate of turning for a WB62 truck (which is larger than a fire truck) has been added from Freeman Road to the North driveway and 22nd Ave NW. Grades are per Barghausen Engineering, and remain less than 10%. If there is concern about turning in any particular location please contact SynThesis Architects.

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.

Response: The southwest trailer parking lot has been removed from the project. We have added pedestrian paths along the entire west sides of both Building A and B.

Provide more detail on 20' private alley with dimensions around it.

Response: This alley has been eliminated from the project.

Fire lane / Street between Bld A and Bld B, provide more clarification for access. Dimensions, sidewalks, lanes, and intersection to enter the complex.

Response: Currently, we are showing 22nd Ave NW between the two proposed project sites, a 60' ROW with sidewalks and lanes to meet standard Puyallup 60' ROW profiles. These are shown on A1.1 along with basic dimensions for the ROW profile and site access. The intersection with Freeman Road is per Barghausen Engineers.

This is not a full review. More information is required to complete.

Response: Acknowledged.

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

- *Off-site paved transitions required*

Response: Paved transitions are shown to the north and south of the site and along Levee Rd to the east and west of Freeman Road.

- *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.*

Response: Commercial driveways have been adjusted to meet WB-67 turning movements.

- *paved roadway along frontage not wide enough for center TWLTL as required per City Standards. Fife standards require minimum 36ft wide roadway*

Response: Plan revised to include 36-ft road with center TWLTL along Freeman Road.

- *Show improvements for 48th St E. Pavement analysis will evaluate existing pavement condition and identify mitigation*

Response: Improvements are not proposed on 48th Street East under the current plan. A pavement analysis has been performed by Terra Associates, Inc. and included in this resubmittal.

- *Per Fife standards, back of sidewalk shall be placed at ROW (35ft from centerline)*

Response: Per ongoing discussion with City of Fife, a preliminary road configuration which may be accepted includes (3) 12' lanes totaling 36' pave width, curb, 4.0' planter and 5' walk. After the required 20' ROW dedication, the back of walk will land about 3.5' west of the ROW line. If required during final engineering, the sidewalk can be shifted to the ROW line and planter space widened accordingly. Some of the unused space is due to bike lane not being required.

- *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*

Response: The revised plan includes 3.5' space between ROW and sidewalk. We believe the current plan to be meeting minimum standards per discussions with Fife Public Works. If the sidewalk position must be shifted further east, this change is not expected to have a significant impact on other project features.

- *30ft ROW does not meet COP standards. Must be 60ft minimum*

Response: Extension of 50th Street East is no longer a part of the proposal. The current site plan includes widening of existing 22nd Ave NW ROW to 60'.

- *Driveways need to meet commercial driveway standards*

Response: All driveways have been modified on the updated site plans. Some have been either moved or deleted.

- *Dead End City Standard Street into a parking lot?*

Response: No longer applicable, as 21st Ave NW is no longer included in the project. There is a similar condition at existing 22nd Ave NW. If this is an issue, it's not a new problem. See the comment below starting with "Fire turnaround at end of ROW?..." for our proposed solution.

- *26ft Roadway width does not meet commercial roadway standards*

Response: Extension of 50th Street East is no longer a part of the proposal. The current site plan includes widening of existing 22nd Ave NW ROW to 60'.

- *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*

Response: A two lane, 28-ft wide road is proposed south of the project extending to Levee Road. Preliminary street light locations based on standard spacing is shown.

- *Show roadway improvements on 19th Ave NW*

Response: 19th Ave has been removed from the site plan.

- *Driveways need to meet commercial driveway standards*

Response: 19th Ave driveways are no longer proposed.

- *Per City standards, must provide curb/gutter/sidewalks/planter strips/streetlights.*

Response: These improvements are included on 22nd Ave NW.

- *Provide details on physical access restriction along Freeman Rd*

Response: Right turn restrictions for trucks turning onto Freeman Rd from the site will be primarily accomplished using signage. The northern driveway will be additionally restricted using a reduced curb radius on the north side which will limit the ability of trucks to negotiate the turn. Trucks are intended to access the site only from the south via Levee Rd to Freeman Rd.

- *Curb alignment must remain constant*

Response: The curb jog has been removed from the site plan.

- *Need to show EV access possible*

Response: The 20' private alley has been removed from the site plan.

- *Fire turnaround at end of ROW? Check with David Drake (Fire) for compliance with Code. What if lots are gated in the future?*

Response: We've pivoted and instead of building out new 21st Ave NW, we propose to retain and widen 22nd Ave NW.

Existing 22nd Ave NW is currently a dead end street with no fire turn around, so any sort of fire turn around is an improvement on the current situation. We've widened 22nd Ave NW to a 60' ROW, and also added hammerhead turn arounds at the end of street on both sides, dimensions per 2018 IFC D103.1. These turn arounds are on the project sites, so there may need to be a recorded agreement with the Puyallup stating that these areas must be publicly accessible – or at least accessible to fire vehicles– and not gated or fenced off. The Owner is willing to enter into an agreement of this sort.

David Drake has noted that full approval of this design will require coordination of multiple departments but for him, this solution is acceptable.

- *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*

Response: Access to Freeman Road has been completely redesigned. Refer to new plans showing primary access point at 22nd Ave NW. Truck turning analysis has also been provided.

- *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)*

Response: The 3-lane configuration is now provided.

- *ESD + SSD sight distance analysis required at this driveway*

Response: Driveway ESD + SSD is now included in plans.

- *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*

Response: Plans revised to include significant widening at the NW corner of the intersection and addition of left turn lanes. Sight distance analysis and preliminary street light locations are included.

- *ESD + SSD sight distance analysis required at this driveway*

Response: Driveway ESD + SSD is now included in plans.

- *Provide details on physical access restriction along Freeman Rd*

Response: Physical access restrictions proposed consist of signage prohibiting right turns onto Freeman Rd from the proposed facility. Weight restriction signage can be included if allowed/desired by City of Fife.

- *50th St E/21st Ave NW must be aligned on either side of Freeman Rd*

Response: We no longer propose to build and develop 50th St E – this comment is no longer applicable.

- *Provide details on physical access restriction along Freeman Rd*

Response: Truck route signage is proposed to direct truck and trailers south to Levee Road. Additional access restrictions will be considered at the city's request (weight restricted road, for example).

- *52th St E/19th Ave NW must be aligned on either side of Freeman Rd*

Response: Neither 19th Ave NW nor 52nd St E are within the scope of the project. 52nd St E is on the opposite side of Freeman Road from the project, not bordering the proposed project at all, and also in a completely different jurisdiction. We have no control over the location of 52nd St E. 19th Ave NW is private road which we also have no control over. In fact, the owners of the land which 52nd St E is upon have disputed our project's right to any access from 19th Ave NW. Our team has been unable to show that we have the right to change anything about 19th Ave NW, and so we have removed any driveways from 19th Ave NW from the proposed site plan. It should be clear that this means we also cannot move 19th Ave NW.

- *ESD + SSD sight distance analysis required at this driveway*

Response: Driveway ESD + SSD is provided on the revised plans.

- *Driveways need to meet commercial driveway standards*

Response: Revised driveways are designed to meet City of Puyallup commercial driveway standards.

- **Traffic Comments**

Preliminary Site Plan Comments:

- *See site plan REDLINES for more detail*

Response: It appears that all redline notes on sheet A1.1 are copied identically to the comments here. We have provided responses to each individual comment.

- *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*

Response: The revised site plan includes keeping 22nd Ave NW and widening to meet the commercial collector street standard. ROW vacation will be limited to portions of an existing bump-out in 22nd Ave NW which was provisioned as a bus stop, but not needed under the current proposal.

- *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*

Response: Truck turn analysis has been included in the preliminary plans. WB-67 trucks assumed for main driveways and public roads.

- *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.*

Response: See revised frontage improvement plans.

- *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.*

Response: Truck route signage is proposed to direct truck and trailers south to Levee Road. Additional access restrictions will be considered at the city's request (weight restricted road, for example).

- *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.*

Response: Physical deterrents are not included on the plans at this time. Additional coordination between Fife, Puyallup, and WSDOT will be required to determine what (if any) deterrent is appropriate for this intersection. We note ongoing design of the SR-167 extension may impact the Valley/Freeman intersection and railroad crossing.

- *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.*

Response: Truck route signage is proposed to direct truck and trailers south to Levee Road.

- *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.*

Response: The site civil has updated the plans to reflect these comments. All of the offsets are existing today with 22nd Avenue NW operating as our primary access to the two buildings. The northern access will be far enough north from 48th Street E to not cause conflicts.

- *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*

Response: Union Pacific was contacted to determine train frequency and timing of gates, no response was received with the information. Observations showed no train activity during the peak traffic hours. The development is adding less than 4% to the PM peak-hour trips along Freeman Road.

- *Any required improvements must meet Union Pacific design requirements.*

Response: Union Pacific was contacted to determine train frequency and timing of gates, no response was received with the information.

- *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.*

Response: Site distance analysis is provided in the revised plans 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*

Response: A preliminary design of pavement widening and turn lane accommodations are shown on the revised plan. The design is based on modeling of simultaneous inbound/outbound WB-67 trucks as requested. Significant ROW dedication is required at the NW corner.

- *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.*

Response: Two 14-ft lanes are proposed south of the site between 19th Ave NW and Levee Road. Additional width is required approaching Levee Road to accommodate a left turn lane and truck turning movements.

- *Show preliminary location of City standard streetlights. Lighting must be provided on Freeman Rd extending to Levee Rd.*

Response: Preliminary light locations have been provided.

- *Guardrail analysis required on steep roadside sections of Freeman Rd and Levee Rd*

Response: The south side of Levee Rd has a guardrail to remain. The north side of Levee Rd will be widened and will have 3:1 slope which will not require guardrail.

Freeman Rd improvements to the north include road widening to accommodate two 14-ft lanes between Levee Rd and 19th Ave NW. The east side of the road will remain at the current location, with widening occurring only on the west side to achieve the full 28-ft width. Grading will be done along the west at 3:1 which does not warrant guardrail.

- *Show improvements to 48th St E*

Response: Improvements are not currently proposed for 48th Street East. The most likely case for construction on 48th Street would include extension of water main with intertie between Fife and Puyallup to support fire flows. The fire flow analysis will be performed by Puyallup and addressed during construction permit.

- *Traffic Impact fees (TIF) will be assessed in accordance with fees adopted by ordinance, per PMC21.10. 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*

Response: Acknowledged.

- *Park impact fee was established by Ordinance 3142 dated July 3, 2017 and shall be charged \$0.87 per sqft of building space.*

Response: Acknowledged.

- *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.*

Response: Comment Acknowledged. We believe this code requirement is being met with the revised site plan.

- *At the time of civil permit review provide a separate street lighting plan and pavement striping plan (channelization) sheet for the City to review.*

Response: Acknowledged. Conceptual improvements are provided on the preliminary plans. Additional analysis and detail will be required during preparation of construction permit plans.

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.*

Response: Updated scoping was performed. The development is not anticipated to be a fulfillment center (sort); therefore, the updated TIA is based on the most likely use of the site a high cube transload short term storage. The trip generation was updated for the 11th Edition and truck trips are based on data from ITE.

- *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)*

Response: The updated trip generation is below typical thresholds of significant impacts for the other jurisdictions.

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.*

Response: This has been updated.

- *Assess existing conditions and document future plans for the Transit Facilities, Railroad Crossing/Operations, and Non-Motorized Facilities.*

Response: This has been updated.

- *Detailed explanation for growth rate assumptions. Typically, short term growth should be assumed at 3% annual growth.*

Response: Used 3% growth rate and Prologis Park Edgewood development.

- *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.*

Response: Channelization warrants are removed. LOS was conducted without southbound left-turns channelization to be conservative.

- *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.*

Response: No data was presented or supplied by the cities or Union Pacific on how many and how long blockings would occur.

- *The TIA must address how project trip distribution impacts related to Canyon Rd & SR167 buildouts.*
 - o *Future baseline/build conditions should not assume these projects are completed when evaluating operational impacts caused by this project.*

Response: Analysis was conducted with and without the SR-167 buildout to show how the WSDOT project would improve the surrounding roadways by removing current by-pass/diverted trips. *Traffic Safety Analysis:*

- *Intersection vehicle crash rates at all study intersections (5 years).*

Response: The collision data has been included in the updated TIA.

- *Include crash severity and types.*

Response: Crash types and severity are included in the updated TIA.

- *Potential countermeasure assessment.*

Response: None of the study intersections reached the threshold for mitigation.

- *Pavement analysis needs to be provided per annexation SEPA conditions.*

Response: The pavement analysis has been completed and is included in the resubmittal.

- *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.*

Response: The pavement surfacing has been analyzed and the report is included in the resubmittal.

- *Once the traffic scoping worksheet is updated, coordinate with Puyallup & Fife on which roadways should be included in analysis.*

Response: Intersections impacted by 20 or more AM or PM peak-hour trips per the City of Fife's requirements as it is more inclusive compared to the City of Puyallup's requirement of 25 trips.

- *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.*

Response: This has been completed and the report is included in the resubmittal.

- *Perform pavement analysis to determine expected terminal serviceability of pavement with and without project.*

Response: Without the project it appears the 48th Street East and Freeman Road East are near their terminal serviceability. North Levee Road East appears to be in a fair to good condition and should have several years of serviceability remaining. With the project, Freeman Road East will be improved and increase the life of the roadway section.

- *Identify needs for any roadway reconstruction or asphalt overlay in order to maintain adequate serviceability period.*

Response: This has been completed and the report is included in the resubmittal.

- *Provide a narrative on how heavy vehicles inflict pavement damage compared to passenger cars, and how this can be mitigated.*

Response: Heavy vehicles inflict greater impacts to the pavement because they transfer greater loads from the tires to the pavement due to the heavy loading. Lighter passenger cars transfer less loading and thereby have a lower impact to pavement sections. This impact can be mitigated by increasing the thickness of the asphalt section, increasing the thickness of the crushed rock section, or improving the subgrade that supports the pavement section. Pavement sections should be designed using an Equivalent Single Axial Loading in accordance with the AASHTO requirements depending on the level of heavy traffic loading expected along the roadways.

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.*

Response: The intent of the design is to restrict truck traffic to Freeman and Levee roads. Signage and other physical restrictions will be considered during final engineering.

- *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.*

Response: A landscape berm is provided between the project and adjacent residential properties to comply with the Freeman Overlay zoning requirements.

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?

Response: No access from the development is to 19th Avenue NE.

- *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?*

Response: The proposed alignment for Freeman Road is to shift the road centerline 4-ft east of the present location, then expand to 36-ft pavement width, including center TWLTL along the project frontage. Culvert replacement is proposed at the north end of the site under Freeman Road. Undergrounding of the roadside ditch is proposed along the west side of Freeman Road north of 48th Street. The current plan includes no pavement or other road appurtenances on the tribal owned land. Proposed grading will necessitate a small easement for placement of an embankment along

a portion of the tribal land due to the proximity of the road and elevation difference to the adjacent grade (road is higher than adjacent grade). The proposed pipe system will have inlet pipes to receive stormwater from the tribal property, replacing the existing ditch and maintaining drainage function.

- *What minimum offsite traffic improvements will be necessary for the applicant to contribute to, to be approved for proposed use?*

Response: Significant widening and turn lanes are proposed at the Levee/Freeman intersection to support all truck traffic entering and exiting the site via Levee Rd. Freeman Road will also be widened to (2) 14-ft lanes between the site and Levee Rd. Storm drainage improvements include flow control and water quality treatment to mitigate for runoff from new impervious surface area.

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

Response: Union Pacific was contacted to determine train frequency and timing of gates, no response was received with the information. Neither city provided data on gate closings or number of trains per day. 70th Avenue E in Fife has a much higher roadway volume and the same crossing condition. Observations showed no train activity during the peak traffic hours. The development is adding less than 4% to the PM peak-hour trips along Freeman Road.

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.*

Response: The developments trucks are not allowed to go north on Freeman to Valley. In addition, there is a sign for southbound vehicles south of Valley on Freeman that restrict Weight Limit to 5 Tons per Fife Municipal Code Chapter 10.44.

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 at a minimum 27 feet to make a 90 degree turn. These turn radii should be modeled.*

Response: Trucks are required to come and go from the south and the turn radii have been constructed to allow for these southbound movements.


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.*

Response: Channelization along Freeman Road is not warranted from a volume or level of service condition; however, turning movements of trucks would benefit from the wider road section. Improvements are being made from the development south to N Levee Road to support the truck traffic that will utilize the site.

We believe these responses along with the revised plans and reports, listed below, provide the City with the information required to issue a SEPA determination and approval for the proposed Preliminary Site Plan. Please reach out to me at cebsworth@barghausen.com or at 425-656-7431 for more information, as needed.

Geotechnical Report by Terra Associates, Inc dated July 11, 2022;
Geotechnical Pavement Evaluation by Terra Associates dated October 14, 2022;
Critical Aquifer Recharge Areas (CARA) Evaluation by Terra Associates, Inc dated September 12, 2022;
Traffic Impact Analysis by Gibson Traffic Consultants dated October 2022;
Critical Areas Report by Anchor QEA dated October 2022;
Cultural Resources Assessment by Environmental Science Associates (ESA) dated May 2022;
Preliminary Stormwater Site Plan by Barghausen Consulting Engineers dated October 14th 2022;
Preliminary Civil Plans by Barghausen Consulting Engineers dated October 18th 2022;
Sanitary Sewer Pump & Force Main Calcs by Barghausen Consulting Engineers dated October 14th 2022;
Preliminary Tree Protection plan by WFCI dated October 14th 2022;
Floodplain Analysis by Barghausen Consulting Engineers dated October 14th 2022;
Preliminary Landscape Plan by WBLA dated October 12th 2022;
Site Plan and Elevations by Synthesis dated October 14, 2022;
Anchor responses to March 4th 2022 Confluence Comments.

Sincerely,


Cheryl Ebsworth
Senior Planner