



September 21, 2022

Chris Beale, Senior Planner
City of Puyallup
Development Services
333 South Meridian
Puyallup, WA 98371

Project: Larson River Road Storage, AHBL No. 2160102.11
Subject: Response to Comments from Various Agencies
Notice of Complete Application - Project #P-21-0087 - SEPA Checklist -
City of Puyallup

Civil Engineers

Structural Engineers

Landscape Architects

Community Planners

Dear Chris Beale:

Land Surveyors

This letter is in response to the comments from various agencies related to the Notice of Complete Application regarding the above referenced project. The comments are included below (verbatim) for your reference. Our responses are shown in **bold** after the comment.

Neighbors

Puyallup Tribe of Indians

Comments from Jennifer Keating dated December 7, 2021

Due to the proposed on-reservation project's proximity to the Puyallup River and known cultural resources, there is a high probability for cultural resource impacts. For this reason, we will need to request a cultural resource survey prior to ground disturbance. Brandon would specifically like to see trenching done in the areas requiring new storm water systems. Please let us know if you have any questions.

Response: Acknowledged. Cultural Resource Study is being completed and will be provided prior to ground disturbance.

Nisqually Indian Tribe

Comments from Brad Beach dated December 8, 2021

The Nisqually Indian Tribe's THPO has reviewed the notice of application and supplemental materials that you provided for the above named project and requests that a cultural resources survey be required as a condition of permitting. Please keep us informed if there are any Inadvertent Discoveries of Archaeological Resources/Human Burials.

Response: Acknowledged. Cultural Resource Study is being completed and will be provided prior to ground disturbance.

TACOMA

2215 North 30th Street
Suite 300

Tacoma, WA 98403-3350

253.383.2422 TEL

www.ahbl.com



Squaxin Island Tribe

Comments from Shaun Dinubilo dated December 9, 2021

Thank you for contacting the Squaxin Island Tribe Cultural Resources Department regarding the above listed project for our review and comment. The project area has a high potential for the location of cultural resources. We recommend an archaeological monitoring and a report be completed for this project. We would prefer to receive an electronic copy by email once completed.

Response: Acknowledged. Archaeological Study is being completed and will be provided prior to ground disturbance.

Tacoma-Pierce County Health Department

Comments from Erica Welborn dated January 6, 2022

The removal and installation of all Underground Storage Tanks (UST) in Pierce County must meet state and Tacoma-Pierce County Health Department (Health Department) requirements. Prior to the removal of UST's a permit must be obtained from the Health Department s underground storage tank and/or contamination are found, ensure to follow regulations for clean-up and removal of tank. Please contact Rob Olson at (253) 649-1856 for further information.

Response: Owner's resources indicate no underground tanks on the site. Note tanks were removed as part of cleanup activities for the site permitted with Ecology.

Department of Ecology

Comments dated December 22, 2021

Solid Waste Management

Derek Rockett (360) 407-6287

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," on Ecology's website at: Construction & Demolition Guidance. All removed debris resulting from this project must be disposed of at an approved site. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

Response: Project will dispose of debris appropriately, in accordance with City Code. Fill material will meet requirements of the permit.



Toxics Cleanup

Sandy Smith (360) 407-7269

This property is within a quarter mile of one known or suspected contaminated site. The site is Style F/X, Facility Site Identification (FSID) 22278. To search and access information concerning this site see <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanups/Cleanup-sites>.

If contamination is suspected, discovered, or occurs during demolition, site preparation, or construction of the auto storage lot, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. To notify Ecology, contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sandy Smith with the Toxics Cleanup Program at the Southwest Regional Office at (360) 407-7269.

Response: Acknowledged. Contamination is not expected on the site based on previous cleanup completed. Note that the intent is to cap existing site and avoid infiltration of stormwater to ensure any undocumented contamination is not spread.

Water Quality/Watershed Resources Unit

Jessica Eakens (360) 407-0246

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State.
 - a. This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
 - a. Determines to be a significant contributor of pollutants to waters of the State of Washington.
 - b. Reasonably expects to cause a violation of any water quality standard.



If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted. For additional information on contaminated construction sites, please contact Carol Serdar at Carol.Serdar@ecy.wa.gov, or by phone at (360) 742-9751.

Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at: <https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx>.

The applicant may apply online or obtain an application from Ecology's website at: [http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application](http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Response: Acknowledged. Construction sequence updated.

Water Quality/Industrial Operations Unit
Honor Carpenter, Senior Industrial Stormwater Permit Facility Manager
(360) 407-6273 | Honor.Carpenter@ecy.wa.gov

Facilities conducting certain industrial activities that discharge stormwater to a surface waterbody or storm sewer system that drains to a surface waterbody are required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for those industrial stormwater discharges under the Department of Ecology's Industrial Stormwater General Permit (ISGP). More information about the Industrial Stormwater General Permit (ISGP) is available at the link below:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit>

Response: Acknowledged.

If you have any questions, please call me at (253) 383-2422.

Sincerely,

Todd C. Sawin, PE, DBIA, LEED AP
Principal

MCH/Isk

c: Josh Larson – Larson Automotive