



CITY OF DUPONT

Department of Community Development
1700 Civic Drive, DuPont, WA 98327
Telephone: (253) 964-8121
www.dupontwa.gov

April 19, 2024

Sent via email only to: wgarrison@lseinc.com

Champions Centre (Applicant)
Wendy Garrison (Agent)
LeRoy Surveyors & Engineers, Inc.
P.O. Box 740, Puyallup, WA 98371

Subject: Request for revisions to Champions Centre applications for Site Plan Review (PLNG2023-010), Critical Areas/Tree Modification (PLNG2023-011), Boundary Line Adjustment/Lot Line Elimination (PLNG2023-012), and SEPA Environmental Review (PLNG 2023-013)

Dear Ms. Garrison:

We are writing to request revisions to continue the review of your application for Site Plan Review, Tree Modification, Critical Areas, Boundary Line Adjustment/Lot Line Elimination, and SEPA Environmental Review for the Champions Centre proposal. In order to move forward with the review, we request the following applications and associated materials be revised as specified below:

Planning Department Comments

1. Site Plan Sheet 2 of 9 (and others) depicts the future parcel line associated with the boundary line adjustment. The new parcel line abuts a future proposed wall, however the wall height at that location is not provided. The City defines a structure as follows:

“DMC 25.10.190.165 “Structure” means anything constructed or erected, the use of which requires location on the ground or attachment to something having location on the ground, but not including fences and walls less than six feet in height.”

Provide the height of the wall at the closest point to the new/proposed parcel line. If the height of the wall is six feet or greater, provide the required building setback from the new/proposed boundary line.

2. The landscape plans depict landscaping around part but not all of the Pierce County Sanitary Sewer Pump Station. **Additional moderate buffer landscaping shall be provided between the Pump Station and the public right of way. The screening will need to wrap around the building to screen the view from traffic heading westbound on DuPont Steilacoom Road.**
3. The landscape plans indicate a 10-foot-wide moderate landscape buffer located along the north property boundary that is adjacent and to and shared with a residential use. The parking lot orientation would allow for vehicular lights to shine north into the residential property. Revisions are needed to shield the residential property from light and glare impacts. The revisions could include re-orientation of the parking spaces to an east/west configuration, the addition of a screen wall or solid board fence and/or

the planting of additional shrubs and trees to provide the needed buffering and protection from light spill and glare. **Revise the plans to protect the adjacent residential property from impacts related to vehicular light spill and glare.**

Other Comments

See the enclosed comments from other City Depts. and City peer review consultants. These comments shall be addressed in your resubmittal plans and response letter.

1. Traffic Impact Analysis – See Geri Reinhart’s memorandum dated Feb. 20, 2024. There are no revisions required, however we are providing the comment memorandum for your information.
2. Building Comments – see Ray Shipman’s email dated Feb. 21, 2024
3. Fire Marshal Comments – see Mike Turner’s email dated Feb. 21, 2024
4. Site Plan Review –Gray & Osborne letter dated Feb. 22, 2024
5. Boundary Line Adjustment – Gray & Osborne letter dated Feb. 23, 2024.
6. Tree Retention Modification Request – Sound Urban Forestry letter dated March 11, 2024.
7. Critical Areas – See Ecological Land Services letter dated April 16, 2024.

If you have any questions, please call me at 253-912-5393, or email me at bkincaid@dupontwa.gov.

Sincerely,



Barb Kincaid, AICP
Director of Community Development

Cc: File No. PLNG2023-010-011-012-013
Lisa Klein, AHBL, Inc. (representing the City of DuPont)

MEMORANDUM

February 20, 2024

TO: Barbara Kincaid, AICP
Public Services Director

FROM: Geralyn Reinart, P.E.

SUBJECT: Champions Centre Development (PLNG2023-022) – Review of
September 2023 Traffic Impact Analysis

The following summarizes my review of the traffic impact analysis (TIA) for the proposed Champions Centre Development dated September 1, 2023 and prepared by Heath and Associates. The traffic study reviews the development of a 25,480 square-foot church and a 3000 square-foot fast casual restaurant. Additionally, 14 electric vehicle (EV) charging stations are proposed for the site (four of which would be associated with the Church). Completion of the project is estimated for 2026. Scoping comments were provided to the Consultant in July of 2023 for the proposed project.

The project site is located on the northwesterly corner of the Barksdale Avenue/DuPont-Steilacoom Road intersection. Access is proposed from Barksdale Avenue (full access) and DuPont-Steilacoom Road (right-turn in and out). The site plan was previously reviewed in early 2020 and traffic comments were submitted at that time; as noted in the scoping comments, it appears that the majority of those comments were included in the current proposal. The proposal reviewed in the TIA could potentially generate 360 net new weekday trips and 43 net new trips during the weekday PM peak hour; 329 net new Sunday peak hour trips are estimated which is when the primary impact would occur from the project. This Sunday peak period is expected to occur in the late morning hours.

Several scoping comments were relayed to the Consultant for inclusion in the TIA, all of which were addressed. These comments included the following:

- Use of the ITE average trip rates rather than the fitted curve equations.
- Revision of the trip generation for the 3000 square foot retail building to represent a higher trip-generating use, as appropriate.
- Revisions of the trip generation data provided for the EV charging stalls to reflect the weighted average of all of the data points.
- Revisions of the trip assignment to reflect use of the average trip rates (and

- the different land use for the 3000 square foot building).
- Revisions to the trip assignment to reflect the future modifications to the Barksdale/DuPont-Steilacoom Road intersection as a three-legged/all-way stop condition and the presence of the new interchange.
- Analysis of the weekday PM peak hour and Sunday peak for the Barksdale/DuPont-Steilacoom Road intersection (with and without project) and the site accesses for the future conditions.
- Use of the future weekday PM peak hour volumes provided by the City for the Barksdale/DuPont-Steilacoom Road intersection based on recent work completed in the Old Fort Lake (Founder's Ridge) EIS. The Applicant provided Sunday peak volumes for existing conditions that were modified to reflect future geometric conditions.
- Review of the adequacy of the (eastbound) left-turn storage on Barksdale Avenue at DuPont Steilacoom Road for the future weekday and Sunday peak conditions for both adequate length and any blockage of the site access.

General Comments:

The analysis was prepared by a consultant fully qualified and experienced in the preparation of analyses of this nature, and conforms to the City's guidelines and includes all the necessary information to complete the review. The study summarized the existing and future conditions in the vicinity, along with the impacts of the project. All identified critical intersections impacted by the project were included in the analysis. A 2.0% annual growth rate was applied to these volumes for future conditions as appropriate (no pipeline trips were necessary/available for the Sunday analysis.)

Specific Comments:

My specific comments with respect to the analysis are as follows:

1. **Page 10, Figure 3** – Existing Sunday peak hour volumes were collected and correctly shown per the field data collected.
2. **Page 11, Section 4.2/Project Trip Generation** – the land use for the 3000 square-foot building was revised from strip retail (as noted in the initial scoping) to a fast casual restaurant. The Consultant noted that the Saturday peak hour generator was applied for the Sunday peak hour. Both of these changes are acceptable.
3. **Page 12, Table 1** – the project trip generation is correctly shown. The total trips changed (slightly higher) from the values shown on the scoping document due to the use of the weighted averages for the EV stations and use of a restaurant rather than retail for the 3000 square-foot building. Pass-by trips were applied to the restaurant use and are acceptable.
4. **Page 14, Figure 4** – the weekday PM peak hour trip assignment was shown for two scenarios. The first scenario assumes that the site access to DuPont-Steilacoom Road is limited to right-turns in and out, and the second scenario

assumes full access. (Note: once the new interchange is completed, full access at this driveway may be allowed.) One minor error was noted in Scenario 2 for the eastbound left-turn onto DuPont-Steilacoom Road from the site access, i.e., two pass-by trips were not shown. Otherwise, all other values were properly shown.

5. **Pages 15-18, Figures 5-8** – the Sunday peak hour trip assignment and future weekday and Sunday peak hour volumes are all correctly shown. More specifically, the Consultant correctly showed on Figure 6 the re-assignment of traffic movements at the Barksdale/DuPont-Steilacoom Road intersection associated with the opening of the new interchange.
6. **Page 19, Table 2** – the level of service (LOS) analyses for the future conditions (with and without the project) indicate that the Barksdale/DuPont-Steilacoom Road intersection should operate at level of service (LOS) “B” or better under either scenario during the weekday PM peak hour and Sunday peak period for the Church. (Note: *this assumes the new configuration and intersection control upon completion of the interchange.*) The accesses are also expected to operate at LOS “B” for either scenario.
7. **Page 20, Section 4.6** – adequate sight distance is expected, but as noted, should be verified on the final site plans.
8. **Pages 21 and 22, Queueing Analysis** – the 95th percentile queue is expected to exceed the existing turn storage for the eastbound left-turn movement on Barksdale at DuPont-Steilacoom Road. The Consultant has suggested increasing the storage length to at least 60 feet (up to 75 feet) as allowable within the existing cross-section and pavement width in order to avoid blockages.
9. **Page 22, Left Turn Warrant Analysis** – based on the WSDOT nomographs, left-turn storage would not be warranted for either site access for either scenario. Having stated that, should full access be allowed in the future along DuPont-Steilacoom Road, the cross-section is sufficient to provide a two-way left-turn lane to serve the access, and should be assumed.
10. **Pages 23 and 24, Conclusions & Mitigation** – impacts associated with the project are fairly limited, especially during the weekday hours. The primary impacts will occur on Sunday morning, as is typical with most churches. As noted above, the Consultant had recommended increasing the storage length of the left-turn lane on Barksdale Avenue at its intersection with DuPont-Steilacoom Road. I concur with this recommendation.
11. **Appendix, Traffic Counts** – no comments.
12. **Appendix, Forecast 2026 Weekday PM Peak Hour** – no comments.
13. **Appendix, Electric Vehicle Parking** – no comments.
14. **Appendix, Trip Generation Summary** – the values as shown are correct.
15. **Appendix, LOS Worksheets (all cases)** – all level of service calculations were checked and were correctly presented in the findings. One minor oversight which would have very limited bearing on the results was not including an exclusive northbound left-turn lane on DuPont-Steilacoom Road at the site access for Scenario 2 (per comment #9, above).
16. **Appendix, Left Turn Lane Warrants** – no comments.

Final Comments

The proposed project is for the development of a Church and a small casual restaurant. EV charging stations would also be provided. The main impacts associated with the project would occur on Sunday morning when Church services occur. The restaurant will be the main attractor during the weekday PM peak hour with limited Church activity during this same time period. The project will have its greatest impacts at the Barksdale Avenue/DuPont-Steilacoom Road intersection. Traffic volumes at this intersection are expected to drop considerably upon completion of the new interchange to the north and operating level of service conditions are expected to be good. The information in the TIA is acceptable as presented and addresses the items that were requested; no additional information or re-submittal of the TIA is needed. Mitigation has been recommended below and involves some minor channelization on the west leg of the Barksdale Avenue/DuPont-Steilacoom Road intersection.

Mitigation

Based on the information presented for the proposed uses, limited impacts are expected. One mitigation measure has been recommended, as follows:

- Modification/extension of the eastbound left-turn lane on Barksdale Avenue at its intersection with DuPont-Steilacoom Road to a length of 60 feet (current length is approximately 40 feet).

Please let me know if you have any questions with respect to the above information or if you'd like to discuss in more detail.

From: [Janet Howald](#)
To: [Lisa Klein](#)
Cc: [Christine Shilley](#)
Subject: [EXTERNAL] FW: Champions Centre Submittal Reviews
Date: Wednesday, February 21, 2024 9:35:40 AM
Attachments: [image001.png](#)

Hi Lisa,

Building comments are below.

Thanks.

Janet Howald

Administrative Specialist | Public Services Department
City of DuPont

Direct 253.912.5232
City Hall 253.964.8121
Jhowald@dupontwa.gov

From: Ray Shipman <RShipman@dupontwa.gov>
Sent: Wednesday, February 21, 2024 9:33 AM
To: Mike Turner <MTurner@dupontwa.gov>; Christine Shilley <PermitTech@dupontwa.gov>; Dom Miller (dmiller@g-o.com) <dmiller@g-o.com>; Geri Reinart (greinart@msn.com) <greinart@msn.com>
Cc: Barbara Kincaid <bkincaid@dupontwa.gov>; Janet Howald <JHowald@dupontwa.gov>
Subject: RE: Champions Centre Submittal Reviews

I have no comments

Ray Shipman CBO/CFM
Building Official | City of DuPont
Direct (253) 912-5216 | 1700 Civic Drive, DuPont, WA 98327

From: Mike Turner <MTurner@dupontwa.gov>
Sent: Wednesday, February 21, 2024 8:18 AM
To: Christine Shilley <PermitTech@dupontwa.gov>; Ray Shipman <RShipman@dupontwa.gov>; Dom Miller (dmiller@g-o.com) <dmiller@g-o.com>; Geri Reinart (greinart@msn.com) <greinart@msn.com>
Cc: Barbara Kincaid <bkincaid@dupontwa.gov>; Janet Howald <JHowald@dupontwa.gov>
Subject: RE: Champions Centre Submittal Reviews

Hi,

Fire has no comments on this submittal.

Thanks,
Mike

From: Christine Shilley <PermitTech@dupontwa.gov>
Sent: Tuesday, February 20, 2024 8:53 AM
To: Ray Shipman <RShipman@dupontwa.gov>; Mike Turner <MTurner@dupontwa.gov>; Dom Miller <dmiller@g-o.com> <dmiller@g-o.com>; Geri Reinart <greinart@msn.com> <greinart@msn.com>
Cc: Barbara Kincaid <bkincaid@dupontwa.gov>; Janet Howald <JHowald@dupontwa.gov>
Subject: RE: Champions Centre Submittal Reviews

Good morning everyone,

Friendly reminder that Barb asked that everyone completed their reviews of the Champions Centre submittal materials by tomorrow.

I reinstated the link to the files, just in case you need to download them:

<https://app.box.com/s/2tbdru3kiulnyp1bha65m1gyr6b2hrt>.

Thank you,

Chris

Chris Shilley | Permit Technician | [City of DuPont](#) | Direct (253) 912-5217

From: Christine Shilley
Sent: Tuesday, February 6, 2024 3:58 PM
To: Ray Shipman <RShipman@DupontWA.GOV>; Mike Turner <MTurner@DupontWA.GOV>; Dom Miller <dmiller@g-o.com> <dmiller@g-o.com>; Geri Reinart <greinart@msn.com> <greinart@msn.com>
Cc: Barbara Kincaid <bkincaid@DupontWA.GOV>; Janet Howald <JHowald@DupontWA.GOV>
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Click [here](#) to view the submittal files. Note: I will remove the link to these files in one week so please download them before then.

Thank you,

Chris

Chris Shilley | Permit Technician | [City of DuPont](#) | Direct (253) 912-5217
DuPont City Hall | 1700 Civic Drive, DuPont, WA 98327
Open Monday – Thursday 9 AM – 4 PM & Friday by Appointment



From: [Janet Howald](#)
To: [Lisa Klein](#)
Cc: [Christine Shilley](#)
Subject: [EXTERNAL] FW: Champions Centre Submittal Reviews
Date: Wednesday, February 21, 2024 8:20:05 AM
Attachments: [image001.png](#)

Good morning Lisa,

Please see Fire comments below.

Thank you,

Janet Howald

Administrative Specialist | Public Services Department
City of DuPont

Direct 253.912.5232
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Chris

Chris Shilley | Permit Technician | [City of DuPont](#) | Direct (253) 912-5217

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February 22, 2024

Ms. Barbara Kincaid
Public Services Director
City of DuPont
1700 Civic Drive
DuPont, Washington 98327

SUBJECT: LAND USE APPLICATION REVIEW, CHAMPIONS CENTRE
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON
G&O #24220.00 TASK 01

Dear Ms. Kincaid:

On February 6, 2024, Gray & Osborne, Inc. received a submittal packet regarding the above-subject project. The packet included the following:

- Cover Letter by Leroy Surveyors & Engineers, Inc. dated December 20, 2023;

Section 1 (All Applications)

- Exhibit 1.a: Title Report by Fidelity National Title dated December 11, 2023;
- Exhibit 1.b: Environmental Checklist (SEPA) dated November 13, 2023;

Section 2 (Land Use Application – Site Plan Review)

- Exhibit 2.a: City of DuPont Land Use Application dated October 2, 2023;
- Exhibit 2.b: Overall Site Plan including vicinity map by Leroy Surveyors & Engineers, Inc. (nine sheets dated December 8, 2023);
- Exhibit 2.c: Landscape Plans by ARW Landscape Design (four sheets dated December 5, 2023);
- Exhibit 2.d: Grading Plans by Leroy Surveyors & Engineers, Inc. (five sheets dated December 8, 2023);
- Exhibit 2.e: Storm Drainage and Utility Plan by Leroy Surveyors & Engineers, Inc. (five sheets dated December 8, 2023);
- Exhibit 2.f: Preliminary Stormwater Report management and calculations by Leroy Surveyors & Engineers, Inc. dated September 2023;



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- Exhibit 2.g: Architectural Elevations/Modulation Plans by Elevation Home Designs (five sheets dated November 15, 2023);
- Exhibit 2.h: Refuse Enclosure Plan by Leroy Surveyors & Engineers, Inc. (one sheet dated October 31, 2023);
- Exhibit 2.i: Traffic Impact Analysis Report by Heath & Associates dated September 1, 2023;
- Exhibit 2.j: Letter of Sewer Availability by Pierce County Planning & Public Works dated December 7, 2023;
- Exhibit 2.k: Letter of Water Availability. City of DuPont Water Availability Form;
- Exhibit 2.l: Landscape Plan Review Memo by Greenforest Incorporated dated December 4, 2023;
- Exhibit 2.m: CSWPPP Report. Stormwater Pollution Prevention Plan SWPPP by Leroy Surveyors & Engineers, Inc. dated September 2023;
- Exhibit 2.n: Maintenance and Source Control Manual by Leroy Surveyors & Engineers, Inc. dated September 2023;

Section 3 (Land Use Application – Critical Area Permit & Tree Modification Permit)

- Exhibit 3.a: City of DuPont Land Use Application dated October 2, 2023;
- Exhibit 3.b: Arborist Report by Greenforest Incorporated dated September 6, 2023;
- Exhibit 3.c: Geotechnical Soil Observation Report by Leroy Surveyors & Engineers, Inc. dated August 24, 2023;
- Exhibit 3.d: Critical Area Report by Grette Associates LLC dated July 2019;
- Exhibit 3.e: Buffer Mitigation Plan by Grette Associates LLC dated December 4, 2023;
- Exhibit 3.f: Habitat Management Plan by Grette Associates LLC dated December 4, 2023;
- Exhibit 3.g: Biologist Submittal Narrative Memo by Grette Associates LLC dated December 4, 2023;
- Exhibit 3.h: Type III Modification Letter by Leroy Surveyors & Engineers, Inc. dated December 20, 2023;
- Exhibit 3.i: Legal Memo regarding Tree Modification by Dille Law PLLC dated December 20, 2023;
- Exhibit 3.j: Cultural Resource Study by Drayton Archaeology dated August 15, 2023;
- Exhibit 3.k: Tree Retention Plan by Leroy Surveyors & Engineers, Inc. (one sheet dated November 15, 2023);



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Section 4 (Boundary Line Adjustment Lot Line Elimination Application)

- Exhibit 4.a: City of DuPont Boundary Line Adjustment Lot Line Elimination Application dated December 15, 2023;
- Exhibit 4.b: Boundary Line Adjustment by Leroy Surveyors & Engineers, Inc. (five sheets dated December 18, 2023);
- Exhibit 4.c: Lot Closures by Leroy Surveyors & Engineers, Inc.;

Section 5 (Response to Pre-Application Meeting comments)

- Exhibit 5.a: Technical Response letter for Planning Department Pre-Application meeting comments, PLNG2023-002 Dated June 2, 2023 by Leroy Surveyors & Engineers, Inc. dated December 19, 2023;
- Exhibit 5.b: Parking Calculation Plan by Leroy Surveyors & Engineers, Inc. (one sheet dated November 14, 2023);
- Exhibit 5.c: City of Public Works Response Data; and
- Exhibit 5.d: Easements encumbering the property.

The proposed development appears to include a religious assembly building, a future retail building, parking lots, drive aisles and utilities at the northwest corner of Barksdale Avenue and DuPont – Steilacoom Road.

We have reviewed this information for compliance with the current City of DuPont Public Works Standards (City Standards), codes, policies, and the DuPont Municipal Code (DMC), and have the following comments:

GENERAL

1. The site plan should reflect all easements, site restrictions and encumbrances from any recorded documents and a current title report.
2. Any existing easements or portions of thereof, not utilized shall be removed or amended. Documentation shall be provided as part of the project closeout requirements.
3. Regarding frontage improvements:
 - A. Per City Standard 2.23.2, all frontage improvements shall be made across full frontage of property from centerline to right-of-way line. A right-of-way permit will be required for the construction of the improvements within the right-of-way.



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- B. The WSDOT I-5 Mounts Road to Steilacoom-DuPont Road project is currently under construction, which includes a roundabout on DuPont-Steilacoom Road north of the project site and revisions to the Barksdale Avenue/DuPont Steilacoom Road intersection. The Applicant should contact the WSDOT project management team to obtain project information to incorporate into the right-of-way design.
- C. The existing improvements on Barksdale Avenue frontage of the project site include roll curb and a 4-foot-wide sidewalk with no planter strip. These improvements do not meet current City of DuPont Standards, and would have to be replaced with development of the property. Current City Standards require roadway widening and/or surfacing, 6-inch vertical curb and gutter, a 5-foot-wide planter strip, 5-foot-wide sidewalk, roadway drainage, and street lighting. The sidewalk could be routed behind the large oak trees in the right-of-way to preserve the trees. The improvements should extend to the west end of the property frontage.
- D. On the corner of the subject property, the curb ramps will be required to be replaced in accordance with current City and ADA Standards. In addition, the existing curb ramps both across Barksdale Avenue and across DuPont-Steilacoom Road will be required to be replaced.
- E. The frontage improvements along DuPont-Steilacoom Road must incorporate sidewalk, curb, gutter, roadway drainage, bike lane, channelization, signage, street lighting, and landscaping from the north end of the proposed driveway to the WSDOT I-5 Mounts Road to Steilacoom-DuPont Road project currently under construction.

4. The site plan shall include an analysis of sight distance triangles to verify that safe stopping and turning movements to and from the site at each driveway approach and at the Barksdale Avenue/DuPont-Steilacoom Road intersection.



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5. A parking lot lighting plan, which includes a photometric exhibit showing the lighting levels within the parking lot, will be required to demonstrate that parking areas are lit in accordance with City code requirements. Lighting shall conform to the requirements of DMC 25.70.070(12).
6. Per DMC 25.70.060(10)(c), all on-site service areas (i.e., loading zones, dumpster, transformer, utility vaults, etc.) shall be located in an area not visible from a public street or open space.
7. The Applicant shall furnish meter sizing calculations for domestic and fire water services. The sprinkler system design, including confirmation of the provided sizing for the fire line components shall be reviewed and approved by the City Building Department and Fire Department as part of the building permit process. Each fire line connection to a City water main will require a double detector check valve assembly (DDCVA) in an underground vault and a Fire Department Connection (FDC) within 50 feet of a fire hydrant. The double detector check valve assemblies (DDCVA) shall be located in underground vaults outside of the building to allow direct access by City staff.
8. All water mains and appurtenances to be owned and operated by the City, up to and including water meters, backflow assembly vaults, and fire hydrants, shall be located in 15-foot-wide easements dedicated to the City. The easements shall be dedicated to the City following construction and prior to final acceptance of this project.
9. A minimum of one fire hydrant per 1,250 gallons per minute of required fire flow shall be provided within 150 feet of the proposed building. The Applicant shall confirm the required fire flow with the City Fire Department and identify the existing and proposed fire hydrants to meet this requirement. A fire hydrant within 50 feet of the FDC for the building will not count towards the required hydrants for fire flow.
10. The City Fire Department shall confirm that the number and location of existing and proposed fire hydrants on or near the project site are adequate for purposes of providing the required fire flow for the proposed building.
11. The site plan must include supplemental turning movement exhibits to demonstrate that the City Fire Department's large apparatus can navigate the site, including in and out of the site accesses, and accessibility to FDCs and hydrants. The design vehicle used shall be identified.



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12. The City's current Stormwater System Development Charge (SDC) will apply to the proposed development.
13. The project activities shall comply with the requirements of the Washington State Department of Ecology National Pollutant Discharge Elimination System (NPDES) general permit for stormwater discharges associated with construction activity.
14. Prior to final approval of the project, as-builts and Geographic Information System (GIS) documentation will be required, in accordance with City of DuPont Municipal Code Chapter 24.10 and Ordinance No. 97-559.

SECTION 1 (ALL APPLICATIONS)

TITLE REPORT

15. All easements identified in the Title Report shall be delineated and labeled on the plans (i.e., width, type, and recording number). Easement callouts should include the numbers corresponding with the Title Report Exception Numbers.

SEPA CHECKLIST

16. Item B.4.d. should include reference to the Buffer Mitigation Plan.
17. Item B.4.e. should state the invasive species as identified in the Buffer Mitigation Plan and Habitat Management Plan.
18. Item C. Signature must be completed by the Applicant's representative or the preparer of the SEPA Checklist.

SECTION 2 (SITE PLAN REVIEW)

LAND USE APPLICATION

We have no comments on the Land Use Application at this time.

OVERALL SITE PLAN

19. Add the City of DuPont Approval block to the upper right corner of all sheets submitted for City review and approval for construction.



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Page 7

20. Add the General Notes (Street Construction) listed in City Standard 11.1 to the Plans.
21. Add a Survey sheet demonstrating existing conditions and items that are proposed to be removed.
22. Show the City of DuPont/Pierce County line on DuPont-Steilacoom Road.
23. Add a Channelization and Signage Plan incorporating onsite and offsite improvements, which include the crosswalk and centerline along Barksdale Avenue and DuPont-Steilacoom Road. The Plan must identify the existing and proposed pavement markings and signage adjacent to and on the site. The bicycle lane on DuPont-Steilacoom Road must meet current MUTCD Standards and provide connectivity with the channelization at the WSDOT future roundabout to the north.
24. The parking lot must comply with the requirements of DMC 25.70.030 Parking areas.
25. The plans shall include a Temporary Erosion and Sediment Control (TESC) Plan. Include the Erosion/Sedimentation Control Notes and Construction Sequence listed in City Standards 11.2 to the Sheets.
26. Add road cross section details for Barksdale Avenue and DuPont-Steilacoom Road.
27. The plans propose to deed the revised Parcel C of the proposed Boundary Line Adjustment to the City. The City should evaluate acceptance of the wetland on 17.17 acres of the revised Parcel C.
28. Add a detail for the 4-foot concrete block wall along the westerly side of the property.
29. City Standard Details shall be utilized where applicable. All relevant City standard details for street, storm drainage, and water construction shall be provided in the plan set submitted for construction review.

LANDSCAPE PLANS

30. There are existing City landscape and irrigation improvements on the Barksdale Avenue and DuPont-Steilacoom Road frontage of this property. Maintenance of these improvements, if retained, would become the



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Applicant's responsibility. The Applicant would be responsible for abandoning and/or reconfiguring these improvements to serve the site. Add a note to this effect to the plans.

31. The rights-of-way lines of Barksdale Avenue and DuPont-Steilacoom Road should be shown and labeled.
32. Landscaping must be provided for the median on Barksdale Avenue.
33. Sheet L1.1:
 - A. Indicates an automatic irrigation system. A separate water service connection, water meter, and backflow assembly located in a 15-foot-wide easement dedicated to the City is required. Irrigation Plans must be provided for review and approval.
 - B. The project information (area, landscape area required, and landscape provided) is inconsistent with Sheet 01 Overall Site Plan. The Applicant should resolve this discrepancy.
34. The City should determine the landscaping and buffer screening requirements at the existing Pierce County Sanitary Sewer Station off of DuPont-Steilacoom Road. It appears landscaping should extend to the reduced wetland buffer on the northerly side of the building.
35. The irrigation water usage of 6.13 gallons per square foot and water conservation statement on Sheet L1.1. comply with the requirements of DMC 25.90.040 and appears to be sufficient for purposes of land use approval.
36. Clearances, in accordance with City Standards, must be reviewed for compliance during construction review. A minimum 3-foot clearance and level area is required around fire hydrants.

GRADING PLANS

37. DuPont-Steilacoom Road is classified as a Minor Arterial. Per City Standard 3.1.1.1., driveways directly giving access onto arterials will be denied if alternative access is available. A Public Works Standards Variance will be required to construct the driveway access to DuPont-Steilacoom Road.



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38. The two driveway approach accesses to Barksdale Avenue and DuPont-Steilacoom Road appears to serve both parcels. A formal written agreement specifying the shared driveway use and maintenance requirements shall be submitted for review and approval of City prior to issuance of a building permit for either lots.
39. A driveway approach as a pedestrian walkway is not consistent with current City Standards. Add a pedestrian walkway behind the proposed driveway approach to DuPont-Steilacoom Road. Label the proposed grade of the approach.
40. Provide a City Standard concrete sidewalk and driveway approach for the Pierce County Sanitary Sewer Station off of DuPont-Steilacoom Road.
41. Per City Standard 3.1.2.1, driveways that serve any use other than detached dwelling units may not be located closer than 150 feet to any street intersection or to any other driveway, whether on or off the subject property. A Public Works Standards Variance will be required to construct the driveway access to Barksdale Avenue. It appears that the left turn lane will need to be extended on Barksdale Avenue and modifications of the road may be required to accommodate the lane extension.
42. An existing sanitary sewer manhole is shown within the proposed driveway approach off of Barksdale Avenue. The manhole location at the grade break between the sidewalk and the driveway approach does not appear to be feasible for construction. If the manhole is placed within the sidewalk, the lid will need to be replaced with a slip-resistant manhole cover. The Applicant must coordinate with Pierce County for requirements.
43. The dimensions of the parking lot stalls and access aisles must comply with City of DuPont Ordinance No. 03-752. A 26-foot aisle width through the parking lot is required. Label the aisle width to demonstrate compliance.

STORM DRAINAGE AND UTILITY PLANS

44. For the existing 84-inch storm pipe through the site, the existing storm easement shall be confirmed and shown on the plans.



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45. Label the existing structures (e.g. concrete pad, concrete wingwalls, chainlink fence) at the northerly end of the 84-inch stormwater outlet. Energy dissipation provisions and/or restoration will be required at the outfall to the wetland. Show and label upstream information for the 84-inch storm pipe.
46. The revised access road for Parcel C as shown on the pre-application plans, north of the Pierce County Sanitary Sewer Station, was removed from the plans. If the City agrees to accept Parcel C, an ingress and egress easement dedicated to the City through the site will be required for access from the right-of-way to the maintenance access road. Alternatively, the previously proposed access road could be installed.
47. The proposed fire service connection to the Religious Assembly building crosses the existing 84-inch storm pipe. Water service lines are subject to the City Standard 5-foot maximum and 3-foot minimum depth requirements.
48. Add profiles of the water, storm, and sewer systems.
49. Provide flow arrows at catch basins and as necessary to demonstrate direction of storm conveyance.
50. The 17,255 SF parking lot on Parcel B is served by a single grated catch basin. A second grated catch basin is recommended to provide redundancy in the event that the first catch basin is clogged or in some other way impaired.
51. Infiltration of rooftop areas shall be utilized where feasible.
52. Add the General Notes (Water System) listed in City Standard 11.3 to the Sheets.
53. Based on City records, there is an existing 12-inch stub out with a 12-inch gate valve off of the 12-inch water main along DuPont-Steilacoom Road to the revised Parcel B south of the Pierce County Sanitary Sewer station. It appears the stub out can be incorporated into the loop through the project site rather than tapping the main across Station Drive.
54. A 5-foot horizontal separation is required between all water facilities and other underground facilities. CB #14 does not meet this requirement.



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55. Drains to daylight or to the onsite storm system shall be provided for the water service vaults and meter boxes as required per City Standard Details.
56. For the eating and drinking establishment building:
 - A. Add a City Standard fire water service connection, DDCVA, and FDC. Identify the sizes.
 - B. Add a City Standard domestic water service connection and DDCVA. Identify the sizes.
57. Show and label all proposed easements. Include the width and purpose.

DRAINAGE REPORT

58. Per the DOE Manual, a minimum of two test pits are required per infiltration trench location. Figure 2 of the Geotechnical Soil Report shows 1 test pit at Infiltration Trench #1 and none at Infiltration Trench #2. Additional test pits should be provided or the Geologist provides supplemental documentation that determines the conditions are relatively uniform and the borings/test pits omitted will not influence the design or successful operation of the BMP.
59. The report must address roadway drainage along Barksdale Avenue and DuPont-Steilacoom Road.
60. Roadway drainage along the DuPont-Steilacoom Road frontage of project site conveys stormwater runoff to the wetland via a conveyance system through revised Parcel B. Minimum Requirement #8 should address wetland protection requirements.
61. The dispersion trench located on Parcel C and shown on Sheet C4 must be described in the stormwater report narrative. It appears that this is a diversion for the existing City stormwater system through the proposed development. Sizing of the dispersion trench must be provided.
62. As a commercial development, the project must provide enhanced treatment for stormwater runoff. The PerkFilter is not approved for enhanced treatment by Ecology.



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63. Details for the infiltration trenches, filter cartridge structures, and all other stormwater elements must be provided. The detail for the filter units should note the treatment flow for each unit, the maximum anticipated flow through each unit, and the peak bypass flow that the unit can pass.
64. The report must address conveyance from the infiltration facilities in the event that they should overflow. Identify a non-erosive overflow channel leading to a stabilized watercourse.
65. The CPEP within each infiltration trench should be perforated.
66. Infiltration Trench 1 appears to have two unconnected and unidentified pipes running alongside the center pipe. Clarify the intended construction.
67. A Temporary Erosion and Sediment Control (TESC) Plan shall be prepared for the project.
68. Conveyance sizing calculations must be provided in the final submittal.
69. Following construction and prior to final acceptance of this project, the Applicant will be required to execute an Agreement for Inspection and Maintenance of Privately Maintained Storm Drainage Facilities. The Agreement should be provided after construction of the storm drainage system to reflect “as-built” conditions.

ARCHITECTURAL PLANS

We have no comments on the Architectural Plans at this time.

REFUSE ENCLOSURE PLAN

70. The submitted Sheet R1, as approved October 31, 2023 by LeMay, Inc., for the two proposed trash enclosure locations (one at each of the two buildings) appears to be sufficient for purposes of land use approval.
71. The recycle and refuse enclosures shall be in accordance with DMC 25.100 Recycling and are subject to the Design provisions of DMC 25.100.050. Provisions for enclosures include sized for both general refuse and recycling DMC 25.100.050(3), concrete surfacing with a concrete apron DMC 25.100.050(4), and a 3-foot wide pedestrian opening for gated enclosures DMC 25.100.050(5).



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TRAFFIC IMPACT ANALYSIS

72. The Transportation Impact Analysis comments should be provided to the City by Ms. Geralyn Reinart, P.E.

SANITARY SEWER DOCUMENTATION

73. The submitted letter from Pierce County Utilities appears to be sufficient for purposes of land use approval.
74. Documentation of Pierce County Public Works and Utilities approval of the sanitary sewer system for this project will be required prior to issuance of a civil construction permit. A Pierce County sewer permit shall be issued before the DuPont civil construction permit and building permit for the project may be issued.

WATER AVAILABILITY

75. The submitted Water Availability Form for this project, which indicates a Proposed Water Usage of 2,365 gallons per day, is sufficient for purposes of land use approval.
76. A completed City "Flow and Pressure for Fire Suppression Design" form is attached for use by the Applicant.

LANDSCAPE PLAN REVIEW MEMORANDUM

We have no comments on the Landscape Plan Review Memorandum at this time.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

77. The Stormwater Pollution Prevention Plan (SWPPP) appears to be sufficient for purposes of land use approval.
78. A final updated version must be provided prior to issuance of a civil construction permit.

MAINTENANCE AND SOURCE CONTROL MANUAL

79. The Maintenance and Source Control Manual appears to be sufficient for purposes of land use approval.



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80. Prior to issuance of a civil construction permit, a final updated version shall be provided

SECTION 3 (CRITICAL AREA AND TREE MODIFICATION)

LAND USE APPLICATION

We have no comments on the Land Application at this time.

ARBORIST REPORT

We have no comments on the Arborist Report at this time.

GEOTECHNICAL SOIL REPORT

81. The project must comply with the recommendations as provided in the Geotechnical Soil Observation Report.

CRITICAL AREA REPORT

We have no comments on the Critical Area Report at this time.

BUFFER MITIGATION PLAN

82. The project must comply with the Native Revegetation Plan, Maintenance recommendations, and Monitoring and Contingency plan as identified in the Buffer Mitigation Plan.

HABITAT MANAGEMENT PLAN

83. The project must comply with the Stormwater Outfall Mitigation Measures and Stream Buffer Enhancement as identified in the Habitat Management Plan.

BIOLOGIST MEMORANDUM

We have no comments on the Biologist Submittal Narrative Memorandum at this time.

TYPE III MODIFICATION LETTER

We have no comments on the Type III Modification letter at this time.



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LEGAL MEMORANDUM

We have no comments on the Legal Memorandum regarding Tree Modification at this time.

CULTURAL RESOURCE STUDY

84. The project must comply with the recommended procedures outlined in the Inadvertent Discovery Protocol, if cultural materials are encountered during project activities, as provided in the Cultural Resource Study.

TREE RETENTION PLAN

We have no comments on the Tree Retention Plan at this time.

SECTION 4 (BOUNDARY LINE ADJUSTMENT)

85. Review of the Boundary Line Adjustment Application, drawings, and lot closure will be provided under separate cover.

SECTION 5 (PRE-APPLICATION MEETING)

We have no comments on the Pre-Application Meeting documents.

Thank you for the opportunity to provide these comments. Please contact the undersigned if you have any questions or comments regarding this review.

Sincerely,

GRAY & OSBORNE, INC.

Dominic J. Miller, P.E.

DJM/sp
Encl.

cc: Mr. Shukri Shurabi, P.E., City Engineer, City of DuPont
Ms. Janet Howald, Administrative Specialist, City of DuPont
Mr. Ray Shipman, Building Official, City of DuPont
Mr. Mike Turner, Fire Marshal, City of DuPont

CITY OF DUPONT

FLOW AND PRESSURE FOR FIRE SUPPRESSION DESIGN

Project Name: **Champions Centre**

Project Location: **Barksdale Avenue and DuPont-Steliacoom Road**

Developer's Engineer: **Leroy Surveyors & Engineers**

Date: **May 19, 2017**

Minimum Fire Flow per Ordinance No 10-905: _____
(see note 1)

Required Fire Flow per I.F.C. 2009: _____

Location Information:

Nearest Street Intersection: **Barksdale Avenue and DuPont-Steliacoom Road**

Model Node Location: **100' NW along Barksdale Avenue**

Model Node ID: **J-190**

2017 Water System Model Results (see notes 2, 3 and 4, and 5 below):

Static Pressure: **55 psi**

Fire Flow: **2,266 gpm**

Residual Pressure: **29 psi**

Fire Suppression System Design Criteria (see note 6 below):

Static Pressure: **45 psi**

Fire Flow: **2,039 gpm**

Residual Pressure: **29 psi**

Notes:

1. Actual fire flow will be based on building construction type and building square footage with credits for fire sprinklers.
2. The 2017 Water System Model results are based on available fire flow during projected 2031 Maximum Day Demand conditions as discussed in the 2011 Water System Plan.
3. Available fire suppression storage is based on the criteria presented in the 2011 Water System Plan, which is defined as 4,000 gpm for 4 hours, or 960,000 gallons.
4. Pipe velocities are limited to 10 feet/second in pipes used for fire flow runs.
5. Four of the six pumps at the Bell Hill booster station were assumed to be operational during fire flow conditions: one 15 HP pump, two 20 HP pumps, and one 50 HP pump.
6. The model results have been adjusted per City policy. The policy reduces the model results as follows:
 - static pressure is reduced by 10 psi
 - available fire flow is reduced by 10% at a minimum allowable pressure of 20 psi

cc: Public Works Department
 Building Department
 Fire Department



February 23, 2024

Ms. Barbara Kincaid
Public Services Director
City of DuPont
1700 Civic Drive
DuPont, Washington 98327

**SUBJECT: CHAMPIONS CENTRE BOUNDARY LINE ADJUSTMENT
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON
G&O #24220.00 TASK 01**

Dear Ms. Kincaid:

On February 6, 2024, Gray & Osborne, Inc. received a submittal packet regarding the above-subject project. The packet included the following:

- Cover Letter by Leroy Surveyors & Engineers, Inc. dated December 20, 2023;
- Exhibit 1.a: Title Report by Fidelity National Title dated December 11, 2023;
- Exhibit 4.a: City of DuPont Boundary Line Adjustment Lot Line Elimination Application dated December 15, 2023;
- Exhibit 4.b: Boundary Line Adjustment by Leroy Surveyors & Engineers, Inc. (five sheets dated December 18, 2023);
- Exhibit 4.c: Lot Closures by Leroy Surveyors & Engineers, Inc.

We have reviewed the Boundary Line Adjustment (BLA) information provided for compliance with City of DuPont Municipal Code 24.07 and City Standards, and have the following comments:

GENERAL

1. Upon recording of the BLA, the applicant shall submit final drawings and G.I.S. AutoCAD files in accordance with the City of DuPont G.I.S. Ordinance 97-559.
2. Upon recording of the BLA, the new lot corners shall be established in accordance with provisions of the DMC 24.07.060 Control Monuments.



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BOUNDARY LINE ADJUSTMENT DRAWINGS

3. On all sheets:
 - A. Add the City File No. with the number supplied by the City.
 - B. Revise the owner information block to indicate Pierce County for the sewer system provider.
4. Per DMC 24.07.040(a)(3), the location and dimensions of all structures/improvements existing upon the affected lots and the distance between structure/improvements and the proposed lot/boundary lines shall be shown (e.g. Pierce County Sanitary Sewer building and fencing, power poles, stormwater outfall concrete pad, concrete wingwalls, and fencing).
5. Per DMC 24.07.040(b)(2), a note shall be placed on the drawings that reads as follows: "This boundary line adjustment is not a plat, replat, or subdivision. Approval of a boundary line adjustment is not a guarantee that future permits will be granted for any structure or development within a lot affected by a boundary line adjustment." Revise the Approval Notes on Sheet 1.
6. Per DMC 24.07.040(b)(3), a note shall be placed on the drawings that reads as follows: "This survey complies with all standards and guidelines of the "Survey Recording Act" Chapter 58.09 RCW and Chapter 332-130 WAC."
7. Easement callouts should include the numbers corresponding with the Title Report Exception Numbers as provided on Sheet 4.
8. Any existing easements, or portions of thereof, to be removed should be noted.
9. If the dedication of Revised Parcel C is accepted by the City, access and easements to the parcel must be provided to the City. The BLA should not be approved by the City until provisions, as acceptable to the City, have been addressed by the Applicant for access to the Revised Parcel C.
10. Prior to approval of the BLA, an easement for the 84-inch storm drainage pipe through Revised Parcel A should be provided, recorded, and the Pierce County recording no. added to the drawings.



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11. In the owner information block, the number of adjusted lots stated on Sheets 1, 2, 4, and 5 indicates 2 and Sheet 3 indicates 4 to 3. This discrepancy should be resolved.
12. Bell Marsh should be labeled.
13. On Sheet 1, labels to identify Parcel A1, A2, and A3 should be added.
14. On Sheets 2 and 3, the note which indicates "see Sheet 1 of 4 for line and curve tables" should be revised to Sheet 1 of 5.
15. On Sheet 4, the Exceptions should reflect the most current Title Report as submitted with this application. The date of Title Report stated should be revised.
16. On Sheet 4, the numbering of the Exception Nos. 13, 14, and 15 are in error.

LOT CLOSURES

We have no comments on the Lot Closures at this time.

Thank you for the opportunity to provide these comments. Please contact the undersigned if you have any questions or comments regarding this review.

Sincerely,

GRAY & OSBORNE, INC.

Dominic J. Miller, P.E.

DJM/sp

cc: Mr. Shukri Shurabi, P.E., City Engineer, City of DuPont
Ms. Janet Howald, Administrative Specialist, City of DuPont
Mr. Ray Shipman, Building Official, City of DuPont

SUF
SOUND URBAN FORESTRY, LLC

Appraisals ~ Site Planning ~ Urban Landscape Design and Management
Environmental Education ~ Tree Risk Assessment

3/11/2024

AHBL
Lisa Klein, Associate Principal
2215 North 30th St, Ste. 200
Tacoma, WA 98403

Cc: City of DuPont, Barbara Kincaid, Director of Public Services

Re: City of DuPont Champions Centre Application Peer Review, PLNG 2023-011

Ms. Klein:

Upon your request, I have conducted a review of the submitted materials you have provided associated with the Champions Centre project in DuPont, Washington. As part of the land use application, the applicant has included a Type III Tree Modification. I have been asked to determine whether the proposed modification follows the City's municipal code as outlined in Chapter 25.10. The following presents my comments.

Exhibit 3.b Arborist Report, 9-6-2023

The report presents a clear and accurate description of the proposed developing parcels and existing vegetation. The tree inspections are acceptable and the inventories, tree descriptions and references to DMC 25.10 definitions are accurate. I also concur with the finding that six of the landmark sized trees are hazards.

What is missing within the report is a clear statement as to whether the Tree Retention Plan meets, exceeds or is deficient in meeting the tree retention requirements as stated in DMC 25.120.030. The report mentions trees retention calculations and presents the numbers of landmark oak and non-oak trees and which are to be retained but it does not specifically address whether this satisfies the City's code.

The report states that Tree #119 is a landmark tree that is to be retained but will not be counted in the retention calculations as it is within ROW and considered a street tree. However, the LeRoy Tree Retention Plan does not show this tree and the table indicates that it is a landmark tree not to be retained.

The report presents within Attachment 3 that Tree #120 is an offsite significant tree to be retained. However, the LeRoy Tree Retention Plan does not show this tree and is listed in the table as a significant tree not to be retained.

Exhibit 3.h Type III Modification Letter 12-20-2023

This document states that 75 Oregon white oak trees will be planted to mitigate the proposed removals of 3 landmark oaks. These trees are indicated to be 4-8' on the landscape plans. They will be very small in caliper and I question whether they meet the City's landscape code.

Landscape Plans 12-5-2023

There is no irrigation plan as part of the submitted set. This needs to be provided.

Grading Plans

Grading is shown to occur within the north end of the Landmark Oak Tree Protection Area and extends into the area beyond the tree protection fencing. Fencing needs to be located *between* the proposed grading and the retained trees. There should always be protection fencing between all equipment and the trees to be retained.

There is no legend or tree protection fencing detail within the grading plans. Neither is there any timeline for when the fencing is to be installed. These items need to be included. Additionally, it should be stated that the fencing installation will be approved by the project arborist prior to ANY land disturbance. This should be provided in writing to the City's building inspector assigned to the project.

Maintenance and Source Control Manual 9-2023

The language presented in Section 6 regarding tree pruning is not acceptable. I request that the project arborist review this section and provide edits that reflect current arboriculture standards.

Regarding the removal of danger, hazard and diseased trees, the report to be submitted to the City should be developed by a Certified Arborist that is tree risk assessment qualified. A landscape architect or professional forester is not suitable for this determination. I also recommend removing the stipulation that allows the landowner to remove trees of imminent threat without consultation with the City.

Professionally Submitted,

A handwritten signature in black ink that reads "Kevin M. McFarland". The signature is fluid and cursive, with "Kevin" and "M." on the first line and "McFarland" on the second line.

Kevin M. McFarland, Principal
Consulting Urban Forester
ISA Certified Arborist PN-0373 & Tree Risk Assessment Qualified
Sound Urban Forestry, LLC
P.O. Box 489
Tahuya, WA 98588
360-870-2511



April 16, 2024

Lisa Klein
AHBL, Inc.
2215 North 30th Street, Suite 300
Tacoma, WA 98403

RE: Peer Review of Champions Center Development Critical Areas for the City of Dupont
(PLNG2023-002).

Dear Lisa:

Ecological Land Services, Inc. (ELS) has been contracted through AHBL, Inc. to conduct a review of the critical areas submittal for the Champions Center Development for the City of DuPont Washington. The documents supplied to ELS for the review include:

- *Mustard Seed Legacy Development, LLC, Critical Areas Report*, prepared by Grette Associates, LLC, dated July 2019.
- *Mustard Seed Legacy Development, LLC, Buffer Mitigation Plan*, prepared by Grette Associates, LLC, dated December 2023.
- *Mustard Seed Legacy Development, LLC, Habitat Management Plan*, prepared by Grette Associates, LLC, dated December 2023.
- Technical Memorandum, *Champions Center Development (PLNG2023-002) Critical Areas Submittal Narrative*, prepared by Grette Associates, LLC, dated December 4, 2023.

ELS biologists reviewed these documents and conducted a site visit on March 2024 to review the wetland boundary delineation and site conditions to confirm the discussions in these documents.

Critical Areas Report

Wetland Delineation

The City of *Dupont Municipal Code* (DMC) *Section 25.105.050(1)(a)(i)* specifies that the identification and delineation of wetland boundaries shall be done in accordance with approved federal wetland delineation manual and applicable regional supplement. All areas within the city meeting the wetland designation criteria in that procedure are hereby designated critical areas and are subject to the provisions of this chapter. As required, the delineation was conducted in accordance with the 1987 U.S. Army Corps of Engineers *Federal Wetland Delineation Manual* and the 2010 U.S. Army Corps of Engineers *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0)*. The delineation of Bell Marsh was conducted in April 2019, which is approaching the 5-year deadline at the end of this month. ELS reviewed site conditions on March 20, 2024, and while flags were not observed, the wetland boundary does not appear to have changed because the wetland is confined to a well-defined depression. Therefore, the wetland delineation is confirmed.

Wetland Categorization

DMC Section 25.105.050(1)(a)(ii) specifies wetland categorization using the Washington State Department of Ecology wetland rating system, as set forth in the Washington State Wetland Rating System for Western Washington: 2014 Update (Ecology Publication No. 04-06-029, or as revised and approved by Ecology), which contains definitions, methods, and criteria for determining a wetland's categorization as a Category I, II, III, or IV.

The wetland categorization was conducted in accordance with the DMC requirements. The categorization form presented in the Critical Area Report has some inconsistencies that require revision and changes to the category and the standard buffer widths. The following sections present the sections where inconsistencies were noted by function and specific questions that require additional assessment.

Depressional and Flats Wetlands: Water Quality Functions

The scores for water quality functions as determined in the wetland rating form completed by Grette Associates differs from the data collected within the wetland and what is presented in the queried database figures and specifically the soil map for Pierce County, Washington. The following questions from the rating form must be corrected to accurately reflect the scores for water quality function.

D 1.2: The soil 2 inches below the surface (or duff layer) is clay or organic (use NRCS definition). The answer to this question was No for which the wetland scored 0 points. Data collected and presented in the critical areas report documents the presence of organic soil (SP 1 and 2). Additionally, the soil map unit is Dupont muck according to the NRCS soil survey. Based on the condition of the soil along with the organic soil type mapped within the wetland, this question should be answered yes and a score of 4 added, which brings the score to 9.

D 1.4: Characteristics of seasonal ponding or inundation. The rating form included in the critical areas report marks seasonal ponding in less than 1/4 of the total wetland area for which the score is 0. The figure documenting the hydroperiods within Bell Marsh shows three separate hydroperiods including permanently inundated, seasonally inundated, and permanently flowing stream. The mapping indicates that the seasonally inundated encompasses at least 1/4 of the total wetland area and perhaps at least 1/2 of the total wetland area. The score for this question would therefore increase from 0 on the rating form to at least 2 and perhaps 4 points, which would increase the potential for water quality functions to moderate or high.

Depressional and Flats Wetlands: Hydrologic Functions

Overall, ELS agrees with the scores for hydrologic functions but there is information missing that would result in a more accurate determination of the wetland rating. It does not appear that the score will change in one direction or the other but having the most accurate information would be beneficial.

D 4.3: Contribution of unit to storage in the watershed. It is unclear if the answer presented on the rating form is correct because the contributing basin was not added to the wetland rating figures. ELS recommends that the contributing basin is accurately reflected on the rating forms to confirm the current answer of 3 points.

Habitat Functions

H 1.4 Interspersion of habitats. The rating form reports that the interspersion of habitats is 2 or moderate but because the figures and H 1.1 show 3 vegetation communities occurring within the wetland, the score should be 3 points. This change in score does not affect the overall score for habitat functions.

H 2.0 Does the landscape have the potential to support habitat at the site? H 2.1 and H 2.2 specify calculations to support the mapping and percentages of accessible and undisturbed habitat and development area. The map provided appears to map the various areas correctly, it is difficult to discern how much area each of the features (accessible habitat, accessible/moderate-low habitat, low-moderate intensity development, and high intensity development) covers within 1 km of Bell Marsh. These calculations should be provided to verify the answers to this rating question.

Buffer Mitigation Plan

The buffer mitigation plan proposes to reduce the wetland buffer from 100 feet to 75 feet that will include enhancement of the buffer. The proposed enhancement will compensate for the reduction of the buffer by 25 percent through removal of invasive species and installation of native trees and shrubs. The buffer has been identified as degraded because of "...significant patches of Himalayan blackberry and English ivy..."

- The buffer mitigation/enhancement plan meets the DMC requirements and adequately improves the function of the buffer and provides additional protection to the wetland. However, there is a discrepancy in the plant numbers outlined in the report. In Section 6.2 Native Plant Installation on page 8 of the Buffer Mitigation Plan, the number of plants to be installed within the enhancement and temporary impact areas are combined for a total of 186 trees and 976 shrubs. They are then separated out in the same paragraph with 13 trees and 66 shrubs in the temporary impact areas and 173 trees and 910 shrubs in the enhancement area. These numbers are accurate in the paragraph describing the plan and Table 4 is accurate for the temporary impact area. However, Table 5 only shows 457 shrubs to be installed within the enhancement area along with the 173 trees. Table 5 needs to be updated to reflect the previously described number of shrubs and trees to be installed in the enhancement area.
- Plant tables with the correct number of shrubs and trees should be added to the buffer mitigation plan drawing so that the proper plant list can be provided to the landscapers. Having the plant tables on the drawings helps the landscapers as well as general contractors to understand the goal of the project in terms of the extent of the planting areas and the species to be installed without having to refer back to the report.

Habitat Management Plan

The Habitat Management Plan (HMP) was prepared to address impacts to the stream buffer and the unmapped stand of oaks. In addition to the stream associated with Bell Marsh, there is a small stand of large Oregon white oaks (*Quercus garryana*) trees mapped within the northwest portion of the subject property (Grette Associates 2019). As this stand of oaks is described in the separately provided Arborist Report prepared by Greenforest, the oak stand is no longer discussed in this document.

Stream

The stream is identified as a natural water feature and meets the criteria for a Type F water for which a 100-foot buffer is required per *DMC Section 25.105.050(2)(g)* from the ordinary high water mark. The required buffer has been applied to the onsite segment of the stream, which does not extend beyond the wetland buffer except at the south end, where reduction is proposed to accommodate stormwater features.

The stream and wetland buffers overlap with the wetland buffer being the primary critical area buffer because it extends beyond the stream buffer. The wetland buffer mitigation plan as proposed covers the areas of stream buffer impacts for stormwater features necessary for the project. The stream buffer impacts are called out separately in the HMP where the stream buffer extends beyond the wetland buffer. The stream buffer impacts are mostly temporary because of grading and filling for installation of stormwater dispersion trench and permanent impacts are necessary to compensate for improvement of the existing access road, which also affects the wetland buffer. The HMP and buffer mitigation as described in the Buffer Mitigation Plan will adequately compensate for the temporary and permanent impacts and provide improved protection for the onsite critical areas. The comments made regarding the wetland buffer enhancement apply to the stream buffer enhancement as well.

Summary and Conclusions

Review of the documents for the Champions Centre discovered some inconsistencies with the critical areas report, buffer mitigation plan, and habitat management plan. These inconsistencies require additional assessment of the wetland rating and updates to the buffer mitigation plan to reflect the plant totals for full enhancement of buffer functions.

- **Wetland Categorization**-The wetland rating form requires the following corrections to accurately reflect the wetland category, which may affect the required buffers.
 - *Water quality function.*
 - **D 1.2:** Revise rating to reflect the Dupont muck soil map unit and the soil data collected during the field delineation.
 - **D 1.4:** Revise rating to reflect the extent of the three mapped hydroperiods.
 - *Hydrologic function.*
 - **D 4.3:** Add the contributing basin to the figure to support the answer given in question
 - *Habitat function.*
 - **H 1.4:** Revise rating to reflect the three vegetation classes mapped within the wetland unit.
 - **H 2.0:** Include the calculations for the various mapping to confirm the percentages of accessible habitat (H 2.1) and undisturbed habitat (H 2.2).
- **Buffer Mitigation Plan**-The buffer mitigation meets the requirements of the DMC because it will provide improved protection for the onsite critical areas through removal of invasive plants and installation of native trees and shrubs. Minor revisions are necessary to show the accurate plant totals.
 - Table 5 and the discussion of plant totals do not match. Revise the planting table so that it reflects the shrub total in the written discussion.
 - Add the plant tables to the enhancement plan drawings so that it represents a complete plan to be used by future contractors and landscapers.

- **Habitat Management Plan**-The HMP meets the requirement of the DMC because it proposes a reduction of no more than 25 percent and enhancement is proposed to compensate for the reduction. In addition, permanent and temporary impacts will be compensated for in the enhancement plan.
 - The planting plan revisions discussed for the Buffer Mitigation Plan should also be revised in the HMP to accurately reflect the plant totals.
 - Revise Section 3.2 of the HMP to address the onsite stand of large oak in the northwest corner of the subject property.

This concludes the review of the critical areas documents prepared for the Champions Centre proposed in the city of DuPont. If there are any questions regarding the comments and requested report revisions, please let me know.

Sincerely,

Joanne Bartlett, SPWS
Professional Biologist