



## CITY OF DUPONT

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

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January 8, 2024

**Sent via email to: [bvarin@avenue55.net](mailto:bvarin@avenue55.net)**

Ben Varin  
Avenue 55  
601 Union Street, Suite 2930  
Seattle, WA 98101

Project: Dupont West (formerly DuPont 243) PLNG 2022-031 (Type III Site Plan Review) and PLNG 2022-032 (SEPA)

Subject: Review Comments and Request for Additional Information

Dear Mr. Varin:

On November 13, 2023, the City received the following additional information related to the Type III Site Plan Review and SEPA environmental review of the DuPont West project:

- Response to Comment Letter dated November 10, 2023
- SEPA checklist revised November 9, 2023
- Water Availability Form
- Cultural Resources Addendum Memo prepared by Natural Investigations Company dated October 2023.
- Geotechnical Report prepared by GeoEngineers dated October 20, 2023
- Noise Study prepared by JGL Acoustics, Inc. dated October 20, 2023
- Stormwater Site Plan Report prepared by Barghausen dated November 6, 2023
- SEPA Site Plan dated October 10, 2023
- Landscape and Irrigation Plans dated October 27, 2023
- Photometrics Plan dated November 2, 2023
- LeMay dumpster location approval October 30, 2023
- Civil Plans dated November 6, 2023
- Traffic Impact Analysis prepared by Heath & Associates dated October 9, 2023
- Tree Retention Plan prepared by Washington Forestry Consultants, Inc. dated October 26, 2023

The Planning Department has reviewed the resubmittal and have the following comments and requests for additional information to continue our review of the proposal. Please also see enclosed comments from Landau Associates related to peer review of the revised Noise Study, Geri Reinart regarding review of the Traffic Impact Analysis, City Fire Marshal, and Gray & Osborne (Engineering).



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### A. DMC 25.105 Critical Areas

1. The geotechnical report must address all requirements of DMC 25.105.050(3). This includes a qualified professional determining the location of landslide areas within or adjacent to the proposal, the size of the landslide setback, and providing recommendations for trail and grading construction within landslide hazard area setbacks. The Geotechnical Report Addendum 3, prepared by GeoEngineers dated October 20, 2023, confirmed the landslide hazard and erosion hazard areas on site and recommended a 50-foot buffer from the top of the slope, which is now depicted on the civil plans. The report recommends the 50-foot buffer be a “non-improvement area”, however the relocated trail and some grading areas are depicted in the hazard area buffer. The Geotechnical Report did not discuss these improvements and/or evaluate whether the location and design could support a “100-year useful life” of the trail as required by DMC 25.105.050(3)(d)(v) and (vii) as follows: (emphasis added):

*(v) Review by Qualified Professional. A geologist or other qualified professional, licensed in the state of Washington, shall review development proposals that occur in potentially geologically hazardous areas to determine the potential risk. If development takes place within an identified geologically hazardous area requiring design or structural elements to mitigate the hazard, the mitigation shall be designed by a qualified professional licensed in the state of Washington with expertise in mitigation of geological hazards.*

*(vi) Life of Structure. Proposed development shall be sited far enough from erosion and landslide hazard areas to ensure at least 100 years of useful life for the proposed structure(s) or infrastructure. The location should be determined by a geologist or other qualified professional, licensed in the state of Washington and should be based on site-specific evaluation of the landslide and/or erosion hazard.*

**Provide a letter from the geotechnical engineer that the proposed trail design within the 50-foot landslide hazard area buffer has been specifically evaluated and can be constructed to ensure at least 100 years of useful life for the trail.**

2. Per DMC 25.105.050(2)(g) a 100-foot buffer is required on each side of a stream as measured from the ordinary high water mark (OHWM). In the Request for Additional Information Letter from the City dated September 22, 2023, it was requested that the OHWM be shown on the civil plans and to extend the 100-foot Sequalitchew Creek buffer from the OHWM. It was also requested that documentation is provided to verify the OHWM location by a qualified biologist. In the most recent submittal on November 13, 2023, the OHWM was depicted on the civil plans and was used as the starting point for the 100-foot Sequalitchew Creek buffer. However, verification by a qualified biologist was not provided and the survey referenced on the civil plan cover sheet is dated May 2011. **Provide documentation that the OHWM has been field verified by a qualified biologist.**



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### B. DMC 25.120 Tree Retention

1. Per DMC 25.120.030(5), no grading shall occur within the dripline of any tree to be retained. The grading plan (Sheet C6 of the civil plans) shows grading within a tree proposed to be retained along the proposed trail extension. **Update the site plan and grading plan to ensure that the trail improvements and all proposed grading is outside of the dripline of any tree to be retained. Alternatively, if the trail alignment and grading cannot be modified so as to avoid encroachment into the dripline of trees to be retained, you can apply for a Type III Tree Modification Request.**
2. Sheet L-1 provides the Tree Protection Measures recommended in the 6-14-2023 WFCI Tree Retention Plan Report. These measures were updated in the resubmittal dated October 26, 2023 including a new paragraph that was added. **Update Sheet L-1 to include the most recent Tree Protection Measures.**

### C. DMC 25.90 Landscaping

1. Per the provided landscape plans (Sheet L3), the proposed landscape area is 8.24 acres, 41.9% of the site area (19.65 acres). This percentage includes the 1.93 acres to be dedicated for ROW. The site area should be the gross area total minus the 1.93 acres being dedicated to ROW. **Update the landscape plan to only include the landscapes percentage of the gross area total minus the 1.93 acres to be dedicated to ROW.**
2. Per DMC 25.90.030(3), the vehicle and trailer parking area located east of the building are required to be screened by a moderate buffer from Sequalitchew Drive and we previously commented that a wall with screening should be provided. The revised plans do not provide a wall and do provide moderate buffer-type landscaping in this area including shrubs and trees with a 6-foot minimum height (Pine and Cedar) and 2-inch caliper Maple. The City will accept a landscape berm in lieu of the previously-requested wall to screen the trailer parking with the 6-foot minimum trees planted on and around the berm. **Update landscape and grading plans to include a berm between the trailer storage area and Sequalitchew Drive and plant as a moderate buffer with 6-foot height trees similar to the berm and buffer provided south of the vehicle parking area.**

### D. Other

1. The Civil Plans include a section for Sequalitchew Drive, however no section is provided for the proposed Sequalitchew Trail relocation. **Provide a proposed section for Sequalitchew Trail.**

If you have any questions, please call me at 253-912-5393.



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Sincerely,

*Barbara Kincaid*

Barbara Kincaid, AICP  
Director of Public Services  
City of Dupont

Enclosures:      Noise Study Peer Review letter prepared by Landau dated August 25, 2023  
                    Fire Marshal Plan Comments on Sheet C7 and C8  
                    Gray & Osborne Comment Letter dated August 20, 2023  
                    G. Reinart Traffic Review Comment Letter dated August 15, 2023

Cc:      PLNG2022-031, -032  
            Dan Balmelli/Betsy Dyer, Barghausen Consulting Engineers

**MEMORANDUM**

December 21, 2023

TO: Barb Kincaid, Director of Public Services  
City of DuPont

FROM: Geralyn Reinart, P.E.

SUBJECT: Review of DuPont Industrial (Sequalitchew) **Updated** Traffic Impact Analysis (October 9, 2023 Revision)

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The following summarizes my review of the updated/revised traffic impact analysis (TIA) for the proposed DuPont Industrial development prepared by Heath & Associates and dated October 9, 2023. This project was most recently reviewed a few months ago (comments dated August 15, 2023) for an update dated July 27, 2023. Prior TIA's were reviewed in March 2018 and February 2018. Furthermore, review comments dated August 7, 2023 for the review of the November 2022 TIA were also provided this year.

This current submittal for October 2023 reviews the development of a slightly larger warehouse building totaling 256,800 square feet, an increase in area of about 5.6% over the 243,180 square foot building reviewed in August. The project site is located on the westerly side of Sequalitchew Drive (if extended), northwest of Center Drive. Access to the site will be from an extension of Sequalitchew Drive, northwesterly from its current terminus. This street currently serves the Creekside Village apartments and ends approximately 500 feet west of Center Drive. The street consists of two eastbound lanes and one westbound lane, with a center landscaped median. Bike lanes are striped on each side of the street and sidewalk is present along the Creekside Village frontage. Curb and gutter have been installed on both sides of the street. The project could potentially generate 444 new daily trips, with 54 new trips generated during the AM peak hour and 57 new trips during the PM peak hour. (This is slightly more than the trips noted in my August 15<sup>th</sup> review.)

My comments with respect to this updated study are as follows (note: these comments are very similar to prior review comments):

### **General Comments:**

A TIA dated November 2017 was initially submitted for the project in February of 2018 but lacked several items and was re-submitted in March of 2018 with the required data. An update dated November 2022 was also submitted and reviewed earlier in August 2023 as well as a revision dated July 27<sup>th</sup> 2023. The latest revision (October 2023) is very similar to the July 2023 analysis with minor revisions to the trip generation and future peak hour volumes (with project) associated with the new site plan and conforms to the City's guidelines and includes all the necessary information to complete my review. As noted in prior reviews, the impacts for this project would be fairly limited, i.e., the number of trips generated by the project is relatively small thereby limiting the impacts to adjacent intersections. Five intersections along Center Drive (Sequalitchew Drive, Palisade Boulevard, Bobs Hollow Lane, McNeil Street, and Wilmington Drive) that would be impacted by 25 or more peak hour trips were analyzed in the TIA for existing and future conditions.

The Consultant used the AM and PM peak hour counts at the five intersections along Center Drive that had been collected in October of 2022, which is acceptable. (Note: *the City also completed traffic counts at four of the five noted intersections earlier in October of 2022; a comparison of the volumes was comparable.*) Traffic volume projections for the future conditions included pipeline trips provided to the Consultant for nine other projects plus a 2% annual growth rate. (Note: *the Consultant again used pipeline trips from the 2018 TIA which have since been updated; see subsequent comments.*)

The results of the analyses indicated that all intersections should operate at an acceptable level of service upon completion of the project (see subsequent section for more specific comments).

### **Specific Comments:**

The following limited comments are specific to the page noted or the appendix/attachments.

1. Page 9, Figure 3 – the existing AM peak hour volumes at Center Drive/Wilmington for the eastbound left and through movements were reversed; however, the correct volumes were used in the calculations and subsequent forecasts; this error was noted in prior reviews and has no bearing on any results or conclusions.
2. Page 11, Table 2 – the level of service analyses for existing conditions indicate acceptable conditions at all locations.
3. Page 12, Trip Generation – trip generation for the project used ITE Land Use Code 150 – Warehousing, which is basically a space devoted to the storage of materials and typically includes small office and maintenance areas. Trip generation was provided for both passenger vehicles and trucks per ITE. Although trucks would comprise about 30% of the daily trips, the percentage of trucks during the peak hours would be smaller. (Note: *as noted in prior reviews, the Consultant used the fitted curve equations for*

the trip generation rather than the average trip rates, as required per the TIA guidelines. The average rates would have resulted in a slightly lower number of trips than those shown in Table 3. As such, the values in Table 3 are conservative and acceptable for use as shown.) The larger building that is proposed would result in one additional trip during the peak hours and 21 more daily trips as compared to the project reviewed back in August.

4. Page 11, Section 4.3 – the future volume forecasts included both a 2% annual growth rate plus the pipeline trips. As previously noted, the pipeline trips from the 2018 TIA were utilized, rather than the more recent values updated in 2022. The number of pipeline trips for 2022 is smaller than those noted in the 2018 list due to several projects having been completed and removed from the list. As such, the future volume projections are higher than necessary and resulted in a more conservative analysis, which is acceptable. Furthermore, the horizon year for project completion was increased by one year which resulted in slightly larger forecast volumes than shown in the 2022 analysis. (This is unchanged from the analyses reviewed earlier this year.)
5. Pages 14 & 15, Figures 5 & 6 – the trip assignments for the AM and PM peak hours had a small error due to the inclusion of truck trips as part of the percentages of total trips rather than separate values routed entirely to the north/northeast. This error was very minor and would not impact the results or conclusions; therefore, the figures are acceptable as shown. (This was noted in my August comments.)
6. Pages 16 & 17, Figures 7 & 8 – the pipeline trips are correctly shown per the above comment #4.
7. Pages 18 & 19, Figures 9 & 10 – the future peak hour volumes (without project) are correctly shown.
8. Pages 20 & 21, Figures 11 & 12 – the future (with project) peak hour volumes are correctly shown for the most part, with some minor errors associated with the trip assignment values per comment #5. These errors are minimal and will not impact any results or conclusions.
9. Page 22, Table 4 – the future peak hour levels of service, with and without the project, are correctly shown. All intersections will meet the City's level of service standard; as such, no off-site mitigation is required. (Note: the seconds of delay are unchanged from the July 2023 analysis due to the limited number of additional peak hour trips associated with the slightly larger building.)
10. Page 22, Section 4.5 – the Consultant notes use of the AASHTO standards for sight distance, however the project will need to comply with the City's Public Works standards. This comment was noted in prior reviews.
11. Appendices/Attachments – all LOS calculations are correctly completed and the results are acceptable as presented; all other attachments are acceptable.

Based on the above comments, I find the analysis to be acceptable as submitted and do not require any changes or a re-submittal.

My prior comments from the earlier submittals as related to the street design are still relevant and are as follows:

- Sequalitchew Drive will eventually carry a significant amount of traffic; as such, I recommend that an exclusive left-turn lane on Sequalitchew Drive at the site access be constructed to serve entering vehicles. Although this installation is not needed at the present time, it will be needed once the vacant land to the north is developed and should be included at this time as part of the street construction.
- It appears from the site plan that the extension of Sequalitchew Drive may impact the trail in this vicinity. If the street extension crosses the trail, then signs and markings should be installed for the trail crossing.

This completes my comments at this time; please give me a call if you have any questions.



December 8, 2023

Transmitted via email to: [bkincaid@dupontwa.gov](mailto:bkincaid@dupontwa.gov)

City of DuPont  
DuPont City Hall  
1700 Civil Drive  
DuPont, WA 98327

Attn: Barbara Kincaid, Director of Public Services

**Re: Updated DuPont 243 Noise Study Peer Review  
Permit Nos. PLNG2022-031 and PLNG2022-031-032  
DuPont, Washington  
Landau Project No. 1260016.010**

Dear Ms. Kincaid:

This letter is an update of the June 21 and August 25, 2023, letters summarizing the peer review conducted by Landau Associates, Inc. (Landau) of the DuPont 243 Noise Studies prepared by JGL Acoustics, Inc. (JGL) on behalf of Avenue 55, dated January 27 and July 21, 2023, respectively. JGL and Avenue 55 submitted a third revised Noise Study (Study) dated October 20, 2023 based on changes to the proposed light-industrial business park plan. The City of DuPont (City) requested that Landau assist the City in evaluating the appropriateness of the Study's assumption and findings. Landau understands that potential noise increases in the vicinity of Sequalitchew Creek Trail are of particular concern to the City.

Landau was unable to conclusively state whether the Study adequately characterized potential project-related noise due to insufficient data and explanation presented in the document. Landau suggests that the City request clarification from JGL. The following bullet points summarize Landau's comments and suggestions, organized by report section.

## **Noise Standards**

- While Federal Highway Administration (FHWA) noise impact criteria are not directly applicable to this project, Landau agrees that they can be useful as a point of comparison in the absence of other quantitative thresholds. In this case, offsite traffic noise is not subject to quantitative thresholds, and the Washington State Department of Transportation (WSDOT) implementation of the FHWA criteria would be most useful, since the project is in Washington. The FHWA criteria identify an impact due to traffic as noise levels "approaching or exceeding" 67 A-weighted decibels (dBA) at residential properties, which WSDOT defines as 66 dBA or above, or an increase of 10 dBA or more.

## City of DuPont Noise Ordinance

- Neither the DuPont Municipal Code (DMC) nor the Washington Administrative Code (WAC) provide a conclusive definition of the environmental designation for noise abatement (EDNA) class appropriate for day-use open spaces and trails. However, given the City's past characterization of Sequalitchew Creek Trail (trail) as a Class A EDNA, Landau agrees that is appropriate to use that classification for this Study. If the City has specific concerns about potential noise impacts to wildlife, a biological assessment could be conducted to evaluate noise sensitivity of species likely to be present in the vicinity of the trail.
- The Study states that noise associated with vehicle operation on private property is subject to the DMC maximum allowable noise levels; however, DMC 9.09.050(d)(14) exempts such sounds except when received in Class A EDNAs.

## Ambient Noise Measurements

- Ambient noise measurements at Positions 1 and 2 show variation in the equivalent sound level (Leq) over time, as expected; however, at Position 3 the Leq is consistently approximately 47 dBA during daytime and nighttime hours, indicating a background noise source. It would be useful to identify the noise source.

## Predicted Site-Generated Noise Levels

More information is needed regarding the noise sources modeled.

- Traffic data:
  - Clarify how JGL determined that 6 a.m. was the worst-case hour. The project-specific traffic study (Heath 2022)<sup>1</sup> provides existing and predicted peak-hour truck and traffic data, identifying peak hours as 7 a.m. and 5 p.m.
  - Clarify how the 24-hour traffic distribution in Table 4 was created and why those data were used instead of the peak-hour data provided in the Heath traffic study.
- Onsite noise sources:
  - The noise model does not appear to include noises such as trucks starting their engines, cargo and bay doors opening and closing, other noises associated with loading and unloading pallets and other materials. Only steady driving and idling are indicated in the description.
  - The noise model includes eight trucks idling at the 55 loading docks and two trucks idling at the 6-trailer parking stall area in the southeastern portion of the property (15 trailer stalls were removed from the southern portion of this area), each for 15 minutes per hour. No noise sources are shown to represent trucks idling in the 38 trailer stalls south of the loading dock doors. Clarify how the number, distribution, and duration of idling trucks were determined.
  - Landau noted that rooftop cooling units were included in the model and finds the sound power level used for the units appropriate.

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<sup>1</sup> Heath. 2022. Report: DuPont Industrial Traffic Impact Analysis, DuPont, Washington. Heath & Associates, Inc. October 26.

- Receivers:
  - Clarify why many onsite receivers were included (P2 and T3 through T13) only to be disregarded as not subject to the DMC noise ordinance limits.
  - If modeled receiver T2 is considered representative of noise levels at the property boundary, placement of that receiver should be explained. Landau suggests including receivers south of the property line in the vicinity of T4 through T13.

## Noise Ordinance Compliance

- Table 5 does not appear to have been updated based on the new model, when compared to Figure 6 (for example, the 50-dBA contour is now on the opposite side of receivers T8 and T9).
- Analysis added since the second report revision indicates that the “time over ordinance level” at receiver T14 is less than 15 minutes, therefore does not violate the noise ordinance: the sound level may exceed the specified limit (47 dBA) by no more than 5 dBA for up to 15 minutes per hour and by no more than 10 dBA for up to 5 minutes per hour. Landau agrees with this assessment, pending an update of Table 5.
- As noted above, onsite vehicle noise is exempt from noise limits when received at Class B properties (Receiver P4, adjacent to the north).
- Landau suggests adding EDNA designations and relevant maximum allowable noise levels to Table 5.
- Column headings in Table 5 identify the noise ordinance as applying to the  $L_{eq}$ . However, the noise ordinance is not based on the  $L_{eq}$  but on a base sound level not to be exceeded for more than 15 minutes of an hour, with short increases allowed over the base limit. Please clarify the noise limits applied at each location and for each time period.
- The walking trail may be used by people during any hours (the trail does not “close” at night); therefore, a comparison of nighttime noise levels to nighttime noise limits represents potential noise exposure at trail locations.

## Noise Impact Analysis

- Clarify whether project-related noise on Center Drive was modeled using CadnaA or other software, if the estimation included trucks starting from a stop before turning left on Center Drive, or if a straight-line screening method (or other calculation) was used to estimate noise based on traffic volume.
- The source of “project” noise levels shown in Table 6 is unclear. Landau would expect these levels to include both onsite and offsite modeled noise levels; however, they do not correspond to data presented elsewhere in the report.
- Clarify whether project day/night sound levels ( $L_{dn}$ ) shown in Table 6 are based on the worst-case or average  $L_{dn}$ . The increase is minimal, so unlikely to affect conclusions, but should be based on the worst-case  $L_{dn}$ .
- The calculation of nighttime maximum sound level ( $L_{max}$ ) is unclear as are the estimates of time over various sound levels. Landau suggests either limiting the comparison to the  $L_{eq}$ , with an explanation of how the  $L_{eq}$  is representative of the sound level exceeded 25 percent of the time,

or presenting a time-based analysis including time spent by vehicles on each road segment in addition to impulsive noise sources presented in the following section.

- US Federal Transit Authority (FTA) noise impact criteria provide a useful point of comparison, but Landau questions why they were not presented at the beginning of the Study, while FHWA and US Department of Housing and Urban Development criteria were presented at the beginning of the Study but not used for comparison.

## **Impulsive Noise Sources**

- The report has been modified to compare modeled impulsive noise to the 6 a.m. Lmax.
- No data have been included to support the impulsive noise levels shown or to explain daytime and nighttime assumptions. It is unclear what changes to the project resulted in significant changes to Table 7.
- A comparison of impulsive noise (including air brakes and other impulsive noise associated with loading and unloading operations) to noise limits is appropriate for the Noise Ordinance Compliance section. Compliance with noise limits (base noise limit +15 dBA) would be protective of impulsive noise impacts.
- Backup alarms are exempt from noise limits, so should not be included in a quantitative compliance analysis.
- Backup alarms are tonal in nature. While they are a common source of complaints for surrounding communities, the primary cause of complaints is associated with the tone rather than the loudness. A qualitative discussion of backup alarms and tonal noise sources would be appropriate.

## **Summary and Mitigation**

- All discussion of potential exceedance of maximum permissible noise limits during nighttime hours (and subsequent noise barrier analysis) has been removed to reflect the time-based analysis on page 14.
- As noted above, Landau was unable to conclusively state whether the Study adequately characterized potential project-related noise due to insufficient data and explanation presented in the document. Base noise limits and maximum (Lmax) noise limits for each receiver and time period should be added to each table where comparisons to the ordinance are made. However, the removal of the noise barrier is consistent with the conclusions presented on page 14.
- Landau agrees that broadband backup alarms and air brake release silencers are useful mitigation strategies for impulsive noises; however, unless the applicant owns or controls all freight trucks visiting the site, these strategies may not be possible to implement on all vehicles.

Landau recommends requesting clarification from JGL on the items noted above. We are happy to discuss further, and/or review future drafts of the Study, as needed.

**LANDAU ASSOCIATES, INC.**



Amy Maule  
Senior Scientist



Kristen Wallace  
Principal

AEM/KLW/ccy  
\\edmdata01\\projects\\1260\\016\\R\\Noise Peer Review\\Landau\_Revised DuPont 243 Peer Review\_Itrprt - 12-08-23.docx

cc: Lisa Klein; [lklein@ahbl.com](mailto:lklein@ahbl.com)



December 29, 2023

Ms. Janet Howald  
Administrative Specialist  
City of DuPont  
1700 Civic Drive  
DuPont, Washington 98327

**SUBJECT: REVIEW COMMENTS, DUPONT 243 (LOT Y)  
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON  
G&O #20303.00**

Dear Ms. Howald:

Gray & Osborne, Inc. is in receipt of a submittal packet for the subject-referenced project. The packet included the following.

- Response Letter, by Barghausen Consulting Engineers, Inc., dated November 10, 2023, responding to City Comment Letter dated September 22, 2023 and Gray & Osborne Comment Letter dated September 21, 2023.
- Revised SEPA Checklist dated November 9, 2023.
- Traffic Impact Analysis, by Heath & Associates, Inc., dated October 9, 2023.
- City Water Availability Form.
- Trash Enclosure Location Drawing, by Innova Architects (one sheet dated October 10, 2023), approved October 30, 2023.
- Stormwater Site Plan, by Barghausen Consulting Engineers, Inc., dated November 6, 2023.
- Revised Geotechnical Report Addendum 3, by GeoEngineers, Inc., dated October 20, 2023.
- Cultural Resources Addendum Memo, by Natural Investigations Company, Inc., dated October 2023.
- Noise Study, by JGL Acoustics, Inc., dated October 20, 2023.
- Architectural Site Plan, by Innova Architects (one sheet dated October 10, 2023).



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- Photometric Drawings, by Range Electric Company, LLC (four sheets dated November 12, 2023).
- Preliminary Civil Engineering Design Plans, by Barghausen Consulting Engineers, Inc. (13 sheets dated November 6, 2023).
- Preliminary Tree Retention, Landscape, and Irrigation Plans, by Barghausen Consulting Engineers, Inc. (12 sheets dated October 27, 2023).
- Tree Protection Plan, by Washington Forestry Consultants, Inc., dated October 26, 2023.

We have reviewed this information for compliance with the current City of DuPont standards, codes, and policies and have the following comments (comment numbering coincides with our previous Comment Letter dated September 21, 2023).

## **GENERAL**

1. Response to comment – accepted.
2. Response to comment – accepted.
3. Response to comment – accepted.
4. Response to comment – accepted.
5. Response to comment – accepted.
6. Response to comment – accepted.
7. Response to comment – accepted.
8. The Title Report Exception Numbers called out on the Plans do not appear to correspond with the last Title Report (dated September 3, 2020) received for this project.
9. Response to comment – accepted.
10. Response to comment – accepted.

## **LAND USE APPLICATION**

11. Response to comment – accepted.



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## **SEPA CHECKLIST**

12. Response to comment – accepted.
13. Response to comment – accepted.

## **TRAFFIC IMPACT ANALYSIS**

14. The Transportation Impact Study comments will be addressed by Ms. Geralyn Reinart, P.E.

## **SEWER AVAILABILITY**

15. Response to comment – accepted.

## **WATER AVAILABILITY**

- 15B. The submitted City of DuPont Water Availability Form appears acceptable for Land Use Application approval. The Form should be revised to identify the proposed water usage in gallons per day and resubmitted for City review and approval.

## **TRASH ENCLOSURE LOCATION**

16. The revised refuse container locations appear to be sufficient for Land Use approval. The project shall demonstrate compliance with DMC 25.100 Recycling. Comment will be required to be addressed prior to issuance of a Construction Permit.

## **STORMWATER SITE PLAN**

17. Response to comment – accepted.
18. The proposed separate storm facility shall be sized to treat and detain the full width of the Sequalit chew Road right-of-way pavement and reflected in the Final Stormwater Site Plan.
19. Response to comment – accepted.
20. Response to comment – accepted.
21. Response to comment – accepted.
22. Response to comment – accepted.



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## **ARCHITECTURAL SITE PLAN**

23. Confirmation from the City Fire Department that the two fire gates identified along the north side of the building are acceptable will be required prior to issuance of a Construction Permit.

## **PHOTOMETRIC DRAWINGS**

24. The Drawings do not include lighting levels for Sequalitchew Road right-of-way. City approval of Street Lighting Drawings demonstrating compliance with City code requirements will be required prior to issuance of a Construction Permit.
25. It appears the lighting levels of the walkways east of the building will need to be revised to meet the Average One-Foot Candle Code Requirement of DMC 25.70.070(12)(d). City approval of the lighting levels demonstrating compliance with City code requirements will be required prior to issuance of a Construction Permit.
26. The mounting heights of the proposed parking area lighting (32.5 and 30 feet) will need to be revised to meet the code requirement of DMC 25.70.070. All lighting shall be baffled to minimize glare. A note to this effect shall be added to the Drawings. Per DMC, yellow lighting is not recommended. The Drawings shall indicate the lighting color temperature in Kelvin. City approval of the Parking Lot Drawings demonstrating compliance with City code requirements will be required prior to issuance of a Construction Permit.

## **PRELIMINARY CIVIL ENGINEERING DESIGN PLANS**

27. Response to comment – accepted.
28. Response to comment – accepted.
29. Response to comment – accepted.
30. Response to comment – accepted.
31. Response to comment – accepted.
32. Response to comment – accepted.
33. Response to comment – accepted.
34. Response to comment – accepted.



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35. Connection to the new trail from the existing trail on the north side of the existing cul-de-sac at the west end of Sequalitchew Drive shall be provided. Comment shall be addressed during civil construction review.
36. Response to comment – accepted.
37. Bollards for the driveway approach shall be installed, per the City Standard Bollard Detail and the exact location, shall be coordinated with the City prior to installation. Comment shall be addressed during civil construction review.
38. The proposed building height demonstrating compliance with DMC 25.45.030(4) shall be identified, and the building setbacks of DMC 25.45.030(3) will be shown and labeled on the Drawings. Comment shall be addressed during civil construction review.
39. Response to comment – accepted.
40. Response to comment – accepted.
41. Response to comment – accepted.
42. Response to comment – accepted.
43. Response to comment – accepted.
44. Full-width and half-width road-cross sections specific to the project shall be added to the Plans, which includes the proposed pavement and lane widths. The City Standard Arterial Roads, Table 2.4-1, provides minimum City standards and should be used as a basis of design. The Plans should state the functional classification of the proposed Sequalitchew Road and demonstrate compliance with the City Street Design Standard, Table 2.5-1. The Plans shall demonstrate the proposed transition and traffic movements from the Sequalitchew Drive and the existing full right-of-way to the proposed half right-of-way. Comment shall be addressed during civil construction review.
45. Response to comment – accepted.
46. Response to comment – accepted.
47. Response to comment – accepted.
48. The proposed right-of-way upon removal of the cul-de-sac, which includes transition of the existing sidewalk on the north side of the Sequalitchew Drive right-of-way, shall be shown. Comment shall be addressed during civil construction review.



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49. Response to comment – accepted.
50. Response to comment – accepted.
51. Response to comment – accepted.
52. Response to comment – accepted.
53. Response to comment – accepted.
54. Per DMC 25.95.050, when any parking space uses a raised sidewalk for the wheel stop, a minimum additional sidewalk width of 3 feet is required. Comment shall be addressed during civil construction review.
55. Response to comment – accepted.
56. Based on City records, an existing gate valve is not available at the point of connection to the existing 12-inch water main on Sequalitchew Drive. The existing gate valve shown on the Drawings is associated with the flushing station. A 12-inch gate valve shall be provided. Comment shall be addressed during civil construction review.
57. Response to comment – accepted.
58. Response to comment – accepted.
59. Response to comment – accepted.
60. Response to comment – accepted.
61. Response to comment – accepted.
62. Response to comment – accepted.
63. Response to comment – accepted.
64. Response to comment – accepted.
65. Response to comment – accepted.
66. Response to comment – accepted.
67. Response to comment – accepted.
68. Response to comment – accepted.
69. Response to comment – accepted.



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70. Response to comment – accepted.
71. A water main connection shall be made from the existing 12-inch water main at the northwest corner of the Creekside Village Apartments development to the northern water main tee within the proposed Sequalitchew Road right-of-way, to provide a looped water main sufficient for fire protection. Comment shall be addressed during civil construction review.
72. Per City Standard 8.6.1.1, fire hydrants shall be installed at intervals not to exceed 300 feet, or as required by the City Fire Chief. Several fire hydrants exceed the 300 Feet Code Requirement. The nearest existing right-of-way fire hydrant is located on the east side of the Sequalitchew Drive/Center Drive intersection. A fire hydrant should be provided near the point of connection on Sequalitchew Drive. Confirmation from the City Fire Department shall be obtained for the fire hydrants that exceed the code requirement. Comment shall be addressed during civil construction review.
73. Response to comment – accepted.
74. Response to comment – accepted.
75. Response to comment – accepted.
76. Response to comment – accepted.
77. Response to comment – accepted.
78. Response to comment – accepted.
79. Response to comment – accepted.
80. Response to comment – accepted.
81. Response to comment – accepted.

#### **PRELIMINARY TREE RETENTION PLANS**

82. Response to comment – accepted.
83. Response to comment – accepted.

#### **PRELIMINARY LANDSCAPE AND IRRIGATION PLANS**

84. Response to comment – accepted.
85. Response to comment – accepted.



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86. Response to comment – accepted.
87. Response to comment – accepted.
88. Response to comment – accepted.
89. Response to comment – accepted.

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.

A handwritten signature in black ink, appearing to read 'Dominic J. Miller'.

Dominic J. Miller, P.E.

DJM/sr

cc: Mr. Shukri Sharabi, P.E., City Engineer, City of DuPont  
Mr. Ray Shipman, Building Official, City of DuPont  
Ms. Barbara Kincaid, Public Services Director, City of DuPont  
Mr. Mike Turner, Fire Marshal, City of DuPont



# City of DuPont Fire Department

*Proudly serving the community of DuPont*

1780 Civic Drive, DuPont, WA, 98327

Phone 253.964.8414 • Fax 253.912.5240 • [www.ci.dupont.wa.us](http://www.ci.dupont.wa.us)

January 8, 2024

TO: Barbara Kincaid  
FROM: Mike Turner Fire Marshal  
RE: DuPont 243 PLNG2022-031 and PLNG2022-032

**The DuPont Fire Department Prevention Division reviewed the above project and has the following comments.**

1. Fire Hydrant Locations are Ok.
2. A building permit issued by the City is required when gates are installed on commercial developments. In order for the City to issue the building permit, the following requirements must be met: **Items A thru E shall be required.**
  - a. Gates shall have an Opticom activation system or an equivalent and compatible system that is approved by the Fire Chief.
  - b. Gates shall have rapid-entry key capabilities compatible with the local fire department per IFC, Section 506.
  - c. All electrically activated gates shall have default capabilities to the unlocked position.
  - d. The minimum clear width of a gate shall be compatible with the required street width.
  - e. Gates that might be obstructed by the accumulation of snow shall not be installed.
  - f. A vehicular turn-around must be provided in front of the gate.

If you have any questions, you may call Fire Marshal Mike Turner at (253) 666-2760 or e-mail [mturner@dupontwa.gov](mailto:mturner@dupontwa.gov).

Sincerely,

Fire Marshal

Mike Turner

**From:** [Ray Shipman](#)  
**To:** [Barbara Kincaid](#); [Mike Turner](#)  
**Cc:** [Mickey Gillie](#); [Lisa Klein](#); [Janet Howald](#)  
**Subject:** [EXTERNAL] RE: RE: Comments needed on development proposal  
**Date:** Thursday, January 4, 2024 2:27:58 PM

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All,

Sorry, I did forget one thing.

We need to make sure that the civil work takes into account, and doesn't conflict, with the EV charging requirements regulated by the amended Washington State Building code.

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

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**From:** Barbara Kincaid <bkincaid@dupontwa.gov>  
**Sent:** Thursday, January 4, 2024 12:51 PM  
**To:** Ray Shipman <RShipman@dupontwa.gov>; Mike Turner <MTurner@dupontwa.gov>  
**Cc:** Mickey Gillie <MGillie@DupontWA.GOV>; Lisa Klein <LKlein@AHBL.com>; Janet Howald <JHowald@dupontwa.gov>  
**Subject:** RE: Comments needed on development proposal

Greetings,

Below is a link to the revised plans and documents for SEPA and Land Use applications PLNG2022-031 and PLNG2022-032 for the DuPont 243 project.

[DuPont 243 Resubmittal 2023-11-10](#)

Would you please provide your comments asap? I have included the review letter from Dominic (G&O) who references that Fire might have input on this proposal.

Thanks,

Barb Kincaid, AICP  
Director of Public Services  
City of DuPont  
253.912.5393