



CITY OF DUPONT

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

September 22, 2023

Sent via email to:

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

Project: 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 August 8, 2023 the City received the following additional information related to the Type III Site Plan Review and SEPA environmental review of the DuPont 243 project:

- Dumpster Location Approval dated July 31, 2023
- Civil Plans dated August 4, 2023
- Landscape and Irrigation Plans dated July 2, 2023
- Photometric Calculations prepared by Range Electric Company dated July 25, 2023
- Architecture Site Plan dated July 17, 2023
- Visual Analysis – Line of sight exhibit dated August 6, 2023
- Land Use Application Form signed August 4, 2023
- SEPA checklist revised August 4, 2023
- Sewer Availability Application revised February 1, 2023
- Bat Habitat Technical Memo prepared by Soundview Consultants, LLC. Dated July 19, 2023
- Cultural Resources Addendum Memo prepared by Natural Investigations Company dated July 2023
- Geotechnical Report Addendum 2 prepared by GeoEngineers dated August 1, 2023
- Noise Study prepared by JGL Acoustics, Inc. dated June 21, 2023
- Stormwater Site Plan dated August 4, 2023
- Traffic Impact Analysis prepared by Heath & Associates dated July 27, 2023
- Tree Protection Plan prepared by Washington Forestry Consultants, Inc. dated August 6, 2023
- Comment Response Letter dated August 8, 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. Civil and Landscape Plan Review

1. The current Photometrics Plan depicts light spill exceeding 1.0 FC along the development footprint, however the property boundary lines are not depicted. The City regulates light spill along the boundary lines. **An updated Photometrics Plan should be provided to demonstrate that less than 1.0 FC of light spill will occur at all property boundaries.**
2. The Architectural Site Plan indicates that 138 standard vehicle parking stalls are provided plus 68 trailer stalls. The landscape plans (Sheet L-3) provide that 140 standard vehicle parking spaces are proposed, which require one tree per six stalls for a total of 23 required parking lot trees. 33 parking lot trees are proposed to be provided. The provided number of standard vehicle parking stalls is not consistent between the Architectural Site Plan and the Landscape Plans. **Update the plans to be consistent in the provided number of parking spaces.**
3. A landscape buffer is proposed between the northeastern parking areas and Sequalitchew Drive. The landscape plans (Sheet L-4) provide nine 2-inch caliper Honey Locust trees adjacent to the right-of-way along the perimeter of the landscaped area, and the addition of 2.5" caliper Oregon white oak trees adjacent to the parking lot with the remaining area to be hydro-seeded/lawn or shrubs and groundcover. **The Honey Locust trees shall be a minimum of 6 feet in height at planting. Update landscape plans to be compliant.**
4. Moderate screening is provided on landscape plans (Sheet L-5) between the east trailer parking/storage area and Sequalitchew Drive, but is not provided between the trailer parking area and the relocated Sequalitchew Creek Trail, where it will be visible to trail users. Moderate screening (50% minimum visual screening) will be required. The definition of a moderate buffer includes treatments such as walls, which in this case is the desired screening of the trailer parking area. **Provide a wall at the south side of the eastern trailer parking area to screen the trailer parking from view of the trail users. The wall shall also meet the blank wall requirements per DMC 25.24.030(5).**
5. The landscape plans depict a stormwater pond south of the southeastern trailer storage area. The landscape plans depict erosion-control hydroseeding throughout the stormwater pond and plantings along the east perimeter. Per DMC 25.90.030(3)(b) the city may require the pond be landscaped to mitigate incompatibility with the adjacent Sequalitchew Creek trail. **Provide moderate buffer type landscaping around the south side of the infiltration pond to screen the pond from the trail.**
6. The Noise Study depicts a sound wall along the southern boundary of the development area. The sound wall is not depicted on the civil plans. **Add the sound wall to the civil plans. Make sure the wall meets the blank wall requirements of DMC 25.24.030(5).**



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B. DMC 25.105 Critical Areas

1. The grading and landscape plans depict trail a small amount of grading within the 100-foot Sequelitchew Creek buffer. This may be permitted as an Exception per DMC 25.105.070, provided it can be clearly demonstrated that the project is needed for the benefit of the public; and no feasible alternative exists; there is not a feasible alternative to the proposed location; and the proposed location results in no net loss in a critical areas' functional value. **Review the grading plans for this area and either (a) revise the grading to avoid any disturbance to the Sequelitchew Creek buffer, or (b) respond to the Exception requirements detailed in DMC 25.105.070(2) to clearly demonstrate there are no alternatives.** Per DMC 25.105.070(2)(c, exception requests shall be made in writing and subject to the administrative authority of the director.
2. The civil plans include a note for "Field Surveyed Top of Upper Stream Bank of Sequelitchew Creek". It appears as though the 100-foot Sequelitchew Creek Buffer depicted on the plans has been located from this top of bank. Per DMC 25.105.050(2)(g)(i), the location of the ordinary high water mark (OHWM) is to be the location the buffer shall be extended from. **Provide the location of the OHWM on the civil plans and extend the 100-foot Sequelitchew Creek buffer from this location. Provide documentation that the OHWM has been field verified by a qualified biologist.**
3. The site has steep slopes that are regulated by the City's Critical Areas Chapter DMC 25.105. DMC 25.105.050(3)(a)(i) defines Landslide Hazard areas and (ii) defines Erosion Hazard areas. DMC 25.105.050(3)(b)(i) provides standards for proposals located within or adjacent to landslide hazard areas. DMC 25.105.030(3)(c) provides that the size of the setback shall be based on the findings of a qualified professional. Finally, DMC 25.105.030(d)(v) requires review of potential geologic hazard areas by a qualified professional. The following geotechnical reports were submitted with the DuPont 243 application:
 - a. Geotechnical Engineer Report prepared by GeoEngineers dated Oct. 10, 2011
 - b. Report Addendum prepared by GeoEngineers dated May 11, 2018
 - c. Report Addendum prepared by GeoEngineers dated Nov. 8, 2022
 - d. Revised Report Addendum 2 prepared by GeoEngineers dated August 1, 2023

Neither of these reports address the evaluation of the presence of landslide or erosion hazard areas nor do they make a recommendation for the size of setback from the top of slope.

Provide a letter from the geotechnical engineer that address the City's Geologic Hazard assessment requirements, makes a recommendation for a protective buffer, and depict the protective buffer on the plans.

4. If any portions of the relocated Sequelitchew Creek trail (or grading for the trail) are to be located within the geologic hazard protective setback area, DMC 25.105.050(3)(b)(i)(A)(III) provides that it shall be clearly demonstrated that no other feasible alternative exists.



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Provide a letter from the civil engineer that demonstrates that the trail is or will be designed to standards and no other feasible alternative exists.

C. DMC 25.120 Tree Retention

1. The submitted Tree Protection Plan prepared by WFC dated August 6, 2023, identifies that there are a total of four (4) landmark Oregon white oak trees on site (Tree numbers 9, 12, 80 and 81; see List of Landmark Trees on DuPont 243 provided as Attachment 3 to the WFC Plan). In the description of cover type 1 in Table 1 it lists that there are six (6) healthy Landmark Oregon white oak trees onsite. The Table in Attachment 3 of the WFC Plan indicates that landmark Oregon white oak trees #9 and #12 are to be removed and trees #80 and #81 are to be retained. The WFC Plan further provides in the narrative that two (2) Oregon white oak landmark trees are proposed to be removed (page 4) consistent with Attachment 3. The Tree Map included as Attachment 2 in the WFC Plan depicts the location and removal of tree #12 but does not depict the location and removal of tree #9. The civil and landscape plans both provide notes that state that one landmark Oregon white oak tree will be removed. Revisions/corrections are needed as follows:
 - i. **Correct the WFC Plan and the civil and landscape plans to be consistent in the number of Landmark Oregon white oak trees to be removed.**
 - ii. **Correct Attachment 1 of the WFC Plan to correctly depict the 19.65-acre project boundary.**
 - iii. **Provide the location of Tree #9 to be removed on all plans (and any other landmark Oregon white oak trees to be removed).**
 - iv. Tree #12 can be removed because it is in the right of way. However, city code provides that it must represent no more than 30% of all Landmark Oregon white oak trees to be removed, which if it is the only Landmark Oregon white oak to be removed (and there are either six or four trees as described in the WFC Plan) meets code. **If Tree #9 cannot be retained, however, per DMC 25.120.050 you are to submit an application for a Tree Modification request (Type III, which requires an application form, full documentation and justification, and a \$3,000 application fee).** Note that a Type III Tree Modification request was not included in the Notice of Application and will require a new Notice of Application and comment period.

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

Sincerely,

Barbara Kincaid, AICP
Director of Public Services
City of Dupont



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Telephone: (253) 964-8121
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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



August 25, 2023

Transmitted via email to: 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, 2023 letter summarizing the peer review conducted by Landau Associates, Inc. (Landau) of the DuPont 243 Noise Study prepared by JGL Acoustics, Inc. (JGL) on behalf of Avenue 55, dated January 27, 2023. JGL and Avenue 55 submitted a revised Noise Study (Study) dated July 21, 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 Sequelitchew 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 Sequelitchew 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)¹ 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 21-trailer parking stall area in the southeastern portion of the property, each for 15 minutes per hour. No noise sources are shown to represent trucks idling in the 47 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.

¹ 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

- 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.
- 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

- Clarify why impulsive noise sources are compared to daytime L_{max} but not to nighttime L_{max} if operations are likely to occur during nighttime hours.

Summary and Mitigation

- The City considers Sequelitchew Creek Trail a Class A EDNA. The trail does not have set hours during which use is allowed, so visitors could use the trail before 7 a.m. The results presented in the Study indicate an exceedance of maximum permissible noise limits during nighttime hours, regardless of whether the use involves sleeping.
- 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.



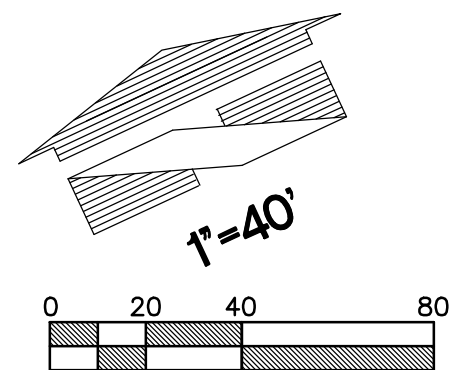
Amy Maule
Senior Scientist



Kristen Wallace
Principal

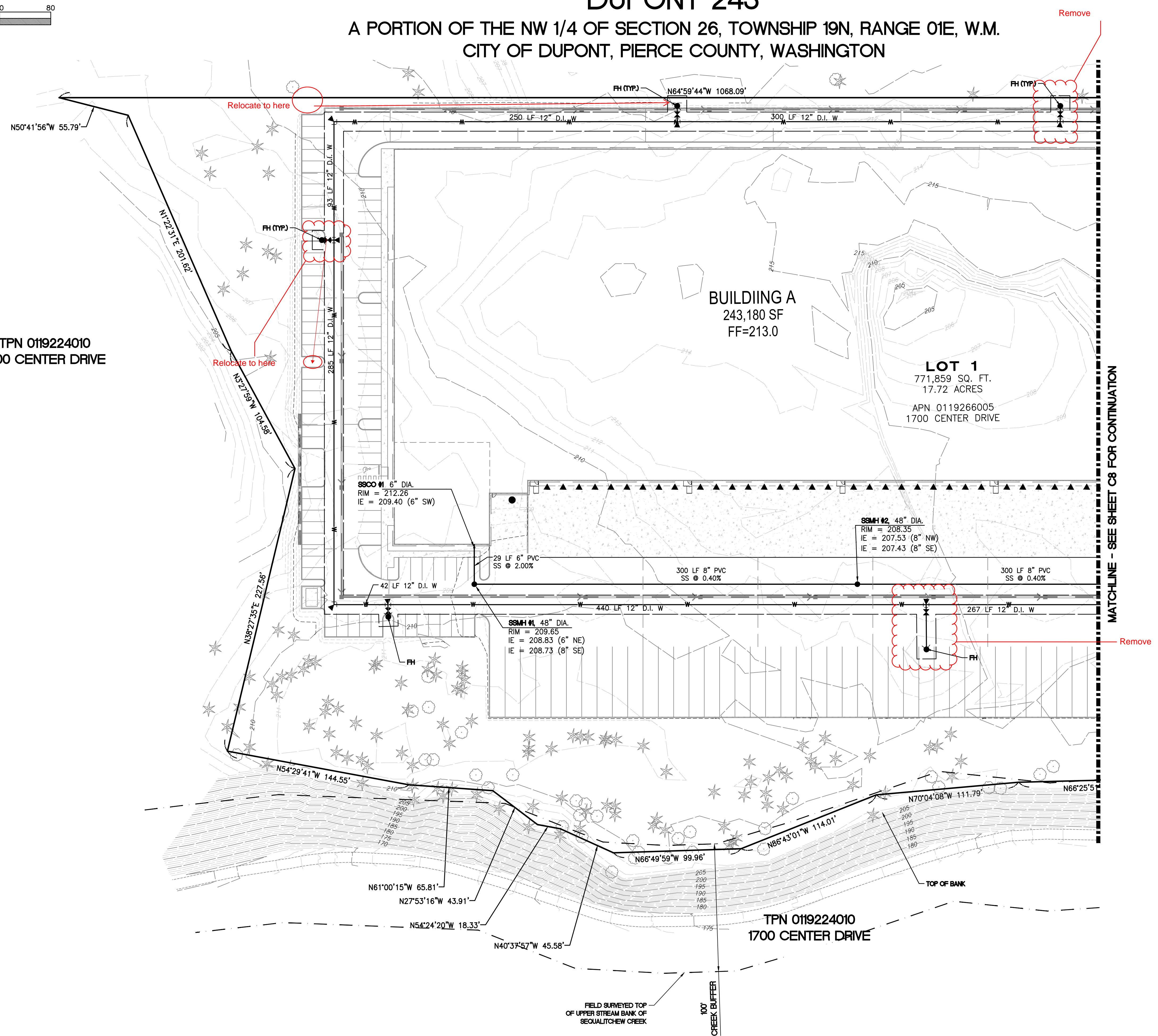
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cc: Lisa Klein; lklein@ahbl.com



PRELIMINARY WATER AND SEWER PLAN-WEST
FOR
DUPONT 243
A PORTION OF THE NW 1/4 OF SECTION 26, TOWNSHIP 19N, RANGE 01E, W.M.
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON

TPN 0119224010
1700 CENTER DRIVE

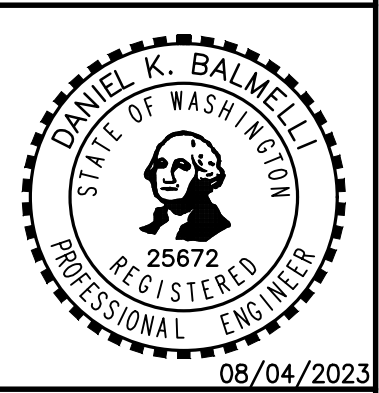


APPROVED FOR CONSTRUCTION
BY: CITY OF DUPONT DATE:
THESE DRAWINGS ARE APPROVED FOR CONSTRUCTION FOR A PERIOD OF 12 MONTHS FROM THE DATE SHOWN HEREON. THE CITY RESERVES THE RIGHT TO MAKE REVISIONS, ADDITIONS, DELETIONS, OR MODIFICATIONS SHOULD CONSTRUCTION BE DELAYED BEYOND THIS TIME LIMITATION. THE CITY, BY APPROVING THESE DRAWINGS, ASSUMES NO LIABILITY IN REGARDS TO THEIR ACCURACY OR OMISSIONS.

No.	Date	By	Ckd.	Appr.	Revision
1	08/04/23	JT	DKB		REVISED PER CITY COMMENTS

PRELIMINARY
WATER AND SEWER PLAN-WEST
FOR
DUPONT 243

For:
AVENUE 55, LLC
601 UNION STREET, SUITE 2930
SEATTLE, WA 98101
(206) 707-9696

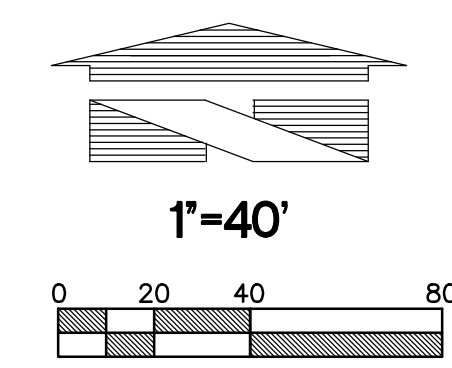


Scale:	Horizontal	Vertical
	1"=40'	N/A
Designed	JAT	
Drawn	JAT	
Checked	DKB	
Approved	DKB	
Date	08/04/23	

18215 72ND AVENUE SOUTH
KENT, WA 98032
(425)251-6222
(425)251-8782 FAX
CIVIL ENGINEERING, LAND PLANNING,
SURVEYING, ENVIRONMENTAL SERVICES
BARGHAUSEN ENGINEERS INC.
CONSULTING ENGINEERS

Job Number
18666
Sheet
C7 of 13

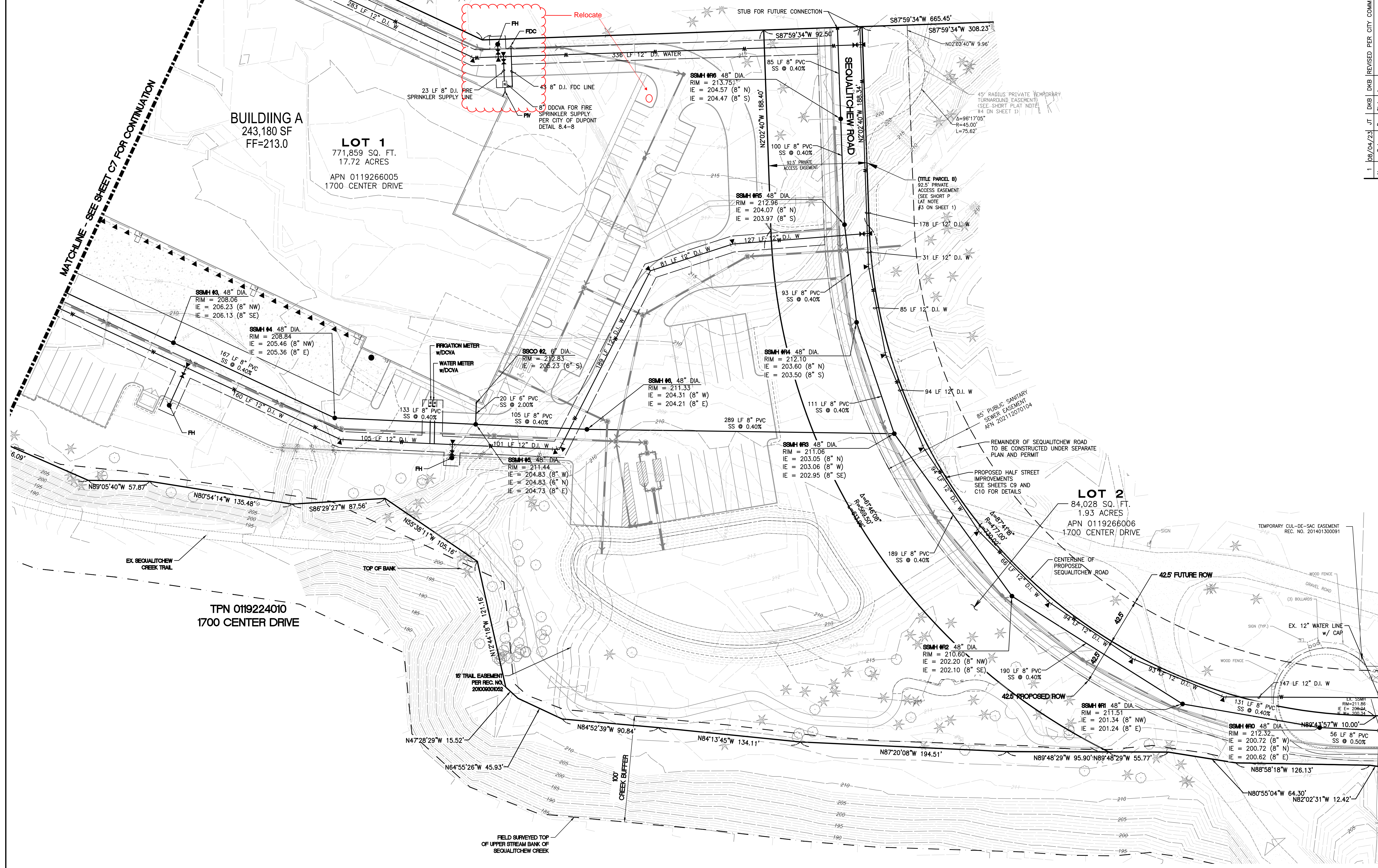
PRELIMINARY WATER AND SEWER PLAN-EAST
FOR
DUPONT 243
A PORTION OF THE NW 1/4 OF SECTION 26, TOWNSHIP 19N, RANGE 01E, W.M.
CITY OF DUPONT, PIERCE COUNTY, WASHINGTON



APPROVED FOR CONSTRUCTION

BY: _____ DATE: _____
CITY OF DUPONT

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Revision	By	Date	Comments
1	DKB	06/04/23	REVISED PER CITY COMMENTS

PRELIMINARY
WATER AND SEWER PLAN-EAST
FOR
DUPONT 243

For:

AVENUE 55, LLC
601 UNION STREET, SUITE 2930
SEATTLE, WA 98101
(206) 707-9696

Scale:

Horizontal: 1"=40'
Vertical: N/A

Designed: JAT
Drawn: JAT
Checked: DKB
Approved: DKB
Date: 09/04/23

18215 72ND AVENUE SOUTH
KENT, WA 98032
(425) 251-6222
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CIVIL ENGINEERING, LAND PLANNING,
SURVEYING, ENVIRONMENTAL SERVICES

Job Number
18666

Sheet
C8 of **13**



September 21, 2023

Ms. Barbara Kincaid
Public Services Director
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. Kincaid:

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

- Response Letter by Barghausen (dated August 8, 2023) responding to City Comment Letter dated May 12, 2023;
- City of DuPont Land Use Application (dated August 4, 2023);
- SEPA Checklist revised August 4, 2023;
- Traffic Impact Analysis by Heath&Associates, Inc. dated July 27, 2023;
- Pierce County Public Works and Utilities Site Specific Sewer Information Letter dated ;
- Trash Enclosure Location email by Ryan Guild of Waste Connections (dated July 31, 2023);
- Stormwater Site Plan by Barghausen (dated August 4, 2023);
- Revised Geotechnical Report Addendum 2 by GeoEngineers (dated August 1, 2023);
- Technical Memorandum by Soundview Consultants, LLC (dated July 19, 2023);
- Cultural Resources Addendum Memo by Natural Investigations Company (dated July 2023);
- Noise Study by JGL Acoustics, Inc. (dated July 21, 2023);
- Architectural Site Plan by Innova Architects (1 sheet dated July 17, 2023);
- Photometric drawings by Range Electric Company (4 sheets dated July 25, 2023);



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- Sequalitchew Trail Line of Sight Exhibit Plans by Barghausen (2 sheets dated August 6, 2023);
- Preliminary Civil Engineering Design Plans by Barghausen (13 sheets dated August 4, 2023);
- Preliminary Tree Retention, Landscape, and Irrigation Plans by Barghausen (12 sheets dated July 2, 2023); and
- Tree Protection Plan by Washington Forestry Consultants, Inc. (dated August 6, 2023).

We have reviewed this information for compliance with the current City of DuPont standards, codes, and policies and have the following comments (comments herein are incorporated with our previous comment letter dated August 22, 2023):

GENERAL

1. The site plan shall reflect all easements, site restrictions, and encumbrances from the short plat and any other recorded documents. Proposed site improvements, within the easements on the project sites, shall comply with the conditions of said easements.
2. 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 will be required for this project prior to issuance of a grading permit.
3. In accordance with Section 2.21 Street Frontage Improvements, all commercial and residential developments, plats, or short plats shall install frontage improvements at the time of construction as required by the City. Such improvements include curb and gutter, sidewalk, street, storm drainage, street lighting systems, utility relocations, landscaping and irrigation (2.21.1) and all frontage improvements shall be made across the full frontage of property from centerline to right-of-way line (2.21.2). For purposes of this review, the proposed 85-foot wide right-of-way is classified as an arterial with features and dimensions as defined in the City's Public Work Standards.
4. An analysis of sight distance triangles to verify that safe stopping and turning movements to and from the site at all points of access to the site shall be provided.



Ms. Barb Kincaid
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5. Following construction, a City of DuPont Agreement for Inspection and Maintenance of Privately Maintained Storm Drainage Facilities will be required for any onsite storm water system.
6. The City's Stormwater System Development Charge (SDC) will apply to this project.
7. The Applicant shall address any applicable mitigation measures associated with this project.
8. All easements identified in the Title Report shall be delineated and labeled on the plans (i.e., width, type, and recording number). Callouts with numbers corresponding with the Title Report Exception Numbers should be provided.
9. Documentation of Pierce County Public Works and Utilities approval of the Sanitary Sewer Plans for this project will be required prior to issuance of a construction permit.
10. This project is subject to the Geographic Information System (GIS) requirements as stated in the City of DuPont Municipal Code, Chapter 24.09, and Ordinance No. 97-559.

LAND USE APPLICATION

11. Item No. 14, Letter of Water Availability from City of DuPont. A completed City of DuPont Water Availability Form identifying the proposed water usage in gallons per day should be submitted.

SEPA CHECKLIST

12. The Environmental Media Management Plan, identified Item B.7.a.2., should be provided.
13. Item No. B.14.a. should be revised to reference Sequatchew Drive.

TRAFFIC IMPACT ANALYSIS

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



Ms. Barb Kincaid
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SEWER AVAILABILITY

15. The submitted Pierce County Utilities information appears acceptable for Land Use Application approval. Documentation of Pierce County Public Works and Utilities approval of the Sanitary Sewer Plans for this project will be required prior to issuance of a construction permit.

TRASH ENCLOSURE LOCATION

16. The submitted plan from LeMay Pierce County Refuse for the refuse container location appears to be sufficient for Land Use approval. The project shall demonstrate compliance with DMC 25.100 Recycling.

STORMWATER SITE PLAN

17. The final Stormwater Site Plan shall include:
 - An off-site analysis report.
 - An analysis of pipe capacity.
 - A pipe conveyance basin map.
18. A separate storm facility intended to treat and detain runoff from the proposed Sequelitchew Road public right-of-way shall be provided.
19. The potential overflow route from the infiltration facilities should be discussed and shown and labeled on the plans.
20. The party responsible for maintenance of the proposed facilities should be identified.
21. Specific maintenance documentation regarding the Contech Stormfilter Cartridges should be provided in the Operations and Maintenance Plan for reference.
22. The Stormwater Pollution Prevention Plan (SWPPP) should include:
 - BMP sheets for each specific BMP to be used on the project site.
 - A template site inspection sheet.



Ms. Barb Kincaid
September 21, 2023
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GEOTECHNICAL REPORT

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

CULTURAL REPORT

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

NOISE STUDY

We have no comments on the Noise Study at this time.

ARCHITECTURAL SITE PLAN

23. Two fire gates are identified along the north side of the building. The City Fire Department should evaluate for acceptance.

PHOTOMETRIC DRAWINGS

24. Street lighting drawings, in accordance with Section 6 (Illumination) of the City Standards, shall be submitted to the City for approval of all street light installations (i.e. Sequalitchew Road). The westerly end of Sequalitchew Drive should be incorporated with the proposed Sequalitchew Road to ensure sufficient lighting coverage is provided. Provide supporting street lighting design information from PSE/Intolight. Both street and on-site lighting drawings shall include photometrics in compliance with City Standard lighting levels. Site lighting shall conform to the requirements of DMC 25.70.070(12). The lighting plan shall include photometric design information for the site and building exterior lighting of the project to demonstrate code compliance with zoning, street, and building code standards.
25. The walkways within the commercial area shall be shown and included in the photometrics with lighting levels averaging at least one foot-candle in accordance with DMC 25.70.070(12)(d).
26. The Applicant should note that DMC 25.70.070 allows 25-foot-tall lighting fixtures in parking lots, except at entries and for parking adjacent to buildings, where lighting remains restricted to 15 feet in height. All lighting shall be baffled to minimize glare. The heights of the proposed



Ms. Barb Kincaid
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parking area lighting shall be stated on the drawings to demonstrate compliance with City code requirements.

PRELIMINARY CIVIL ENGINEERING DESIGN PLANS

27. On Sheet C1, the following should be addressed:
 - A. Sequalitchew Drive should be labeled in the Vicinity Map.
 - B. Parcel Number 0119262019 appears to be in error.
28. All easement labels should include indication of either "Public" or "Private."
29. The approximate cut and fill quantities shall be added to the plans.
30. 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.
31. Retaining walls shall comply with City Standard 5.5. The design of structural walls shall be by a professional engineer qualified in retaining wall design. Design calculations shall be submitted to the City.
32. A composite utility sheet should be added to the plans.
33. Locations of proposed onsite and offsite curb ramps and detectable warning patterns should be shown and labeled.
34. A pedestrian connection from the sidewalk on the south side of Sequalitchew Road to the Sequalitchew Creek Trail shall be provided.
35. Indicate the improvements to the Sequalitchew trail. The new trail shall be extended across Lot 2 to connect to the existing trail/gravel road at the southeasterly property line of Lot 2. Provide a cross section of the proposed trail. Show and label the existing trail/gravel road at the east end of Lot 2. 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 should be provided.



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36. Any existing trail easements that do not coincide with the new trail alignment will need to be extinguished and a new trail easement provided across Lots 1 and 2.
37. A City Standard driveway approach with bollards should be provided on south side of Sequalitchew Road at the easterly existing gravel road for City maintenance access. Label the gravel road and width.
38. Identify and add the building setbacks demonstrating compliance with DMC 25.45.
39. On Sheet C3, provide protection measures for the existing sanitary sewer manhole located at the proposed construction entrance location.
40. On Sheet C4, the Temporary Construction Entrance Detail shall show geotextile and 100' length per Figure II-4.1.1 of the DOE Stormwater Management Manual for Western Washington. Label the length on Sheet C3.
41. On Sheet C4, Erosion Control Notes #4 and #5 shall indicate Sequalitchew Drive and Center Drive.
42. Show and label the centerline and stationing of the proposed Sequalitchew Road right-of-way in all applicable sheets.
43. Right-of-way for the Sequalitchew Road, located on Lot 2, shall be dedicated to the City as part of the development of Lot 1 and/or Lot 3. This road is required for consistency with the City's Comprehensive Plan.
44. The project proposes half street improvements for Sequalitchew Road right-of-way. A road cross-section and channelization of the proposed half street improvements shall be added to the plans. The functional classification for the proposed Sequalitchew Drive extension is an arterial. The road cross-section shall meet City Public Works Standards and should match the existing road cross-section. Although half-street improvements may be allowed, the design of the full width of the Sequalitchew right-of-way and utilities shall be provided.
45. Channelization drawings shall include the locations of:



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- Signage and relocation of existing signage, where necessary.
 - City of DuPont Trail Designation Signs.
 - Pavement markings.
 - Detectable Warning Patterns.
 - Crosswalks.
46. The full width of the 85 foot wide right-of-way (i.e. 42.5 feet of Lot 2 and 42.5 feet of Lot 3) should be dedicated to the City. The remaining 50 feet of the 92.5 feet of Lot 2 should be owned and maintained by Lot 1. The City should not share maintenance responsibility for this portion of land.
47. On Sheet C1, a 92.5 foot access easement is labeled. The plans should clarify the future intent and ownership of Lot 2; excluding the proposed right-of-way.
48. Sheet C3 indicates existing cul-de-sac to be removed. The plans shall show 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 Sequelitchew Drive right-of-way and westbound traffic from Center Drive.
49. On Sheet C9, it appears the proposed right-of-way does not align to the existing Sequelitchew Drive right-of-way. The proposed right-of-way should match and be consistent with the cross-section of the existing Sequelitchew Drive right-of-way.
50. Add sight triangles to the driveway entering the proposed Sequelitchew Drive right-of-way.
51. The plans shall demonstrate compliance with the underlying Short Plat No. PLNG2020-017. Per Short Plat Notes No. 4, the existing 45-foot radius private temporary turnaround easement on the northerly end of Lot 3 is for the benefit of Lots 1, 2, and 3. The easement will automatically extinguish once Sequelitchew Road is dedicated to the City for public use. At that time a new temporary easement dedicated to the City will be required for the proposed Temporary cul-de-sac at the end of Sequelitchew Road extension. The easement shall remain in effect until the development of Lot 3.



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52. The temporary cul-de-sac should be consistent with the City Standard Cul-de-sac Detail, which includes a 45-foot minimum radius to edge of pavement.
53. A 45-foot wide driveway approach is proposed. Per City Standard Driveway Approach Detail, the maximum driveway is 35-feet for commercial. Driveways wider than 35 feet may be approved by the City considering both traffic safety and the activity being served. If the Applicant proposes to keep the driveway greater than 35 feet in width, written justification shall be provided to the City.
54. The parking lot shall be designed in accordance with DMC 25.70.030, DMC 25.95, and Ordinance No. 03-752, which includes, but limited to, screening as approved by the City. Add the dimensions to the parking lot stalls and loading spaces to demonstrate compliance.
55. Parking stalls and pedestrian ramps shall meet current building code and ADA requirements.
56. The operation of the existing water main shall be maintained while making connections. For extension of the water main, a gate valve shall be provided at the point of connection to the existing water main for isolation and to facilitate disinfection and testing requirements.
57. Label the 15-foot wide water easement dedicated to the City. The easements shall be dedicated to the City following construction and prior to final acceptance of this project.
58. 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.
59. Label the domestic, fire, and irrigation water service connections. Show separate symbols for the proposed water meters and DCVA's located within the 15-foot water easement. Include the size.
60. Cross-connection control, in accordance with WAC 246-290-490, shall be provided by installation of an approved backflow preventer commensurate with the degree of hazard for protection of the public water system.



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61. Drains to daylight, infiltration sump, or to the onsite storm system shall be provided for the water service vaults and meter boxes as required per City Standard Details.
62. 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.
63. The proposed development shall be provided with fire lanes, as required by the City of DuPont Fire Department.
64. A turning exhibit demonstrating sufficient turning movement of the largest Fire Department apparatus can navigate through the site, ingress/egress to Sequatchew Road, and access to FDCs and hydrants shall be submitted. City of DuPont apparatus specifications available upon request.
65. Per City Water Standards for water services, all water service lines under paved roads between the water main and the water meter shall be sleeved with 2-inch Schedule 80 PVC pipe. Add a note to this effect.
66. Per City Standard 8.7.2.1, air and vacuum relief assemblies shall be located at all high points of water mains and shall be installed per Standard Details.
67. Per City Standard 8.8.1, a sampling station shall be set at a location approved by the City and shall be installed per Standard Details. Locations will be provided by the City.
68. The construction plans shall include profiles for water mains to include proposed utility crossings.
69. Two water valves are required for all tees.
70. An automatic flushing station with a 2-inch water service connection and 2-inch water meter was installed at the proposed point of connection to the existing water system on Sequatchew Drive. The station and the associated appurtenances shall be relocated to the northerly end of the proposed waterline stub.



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71. In accordance with City policies of requiring looping of water mains or providing future looping of water mains via extension of property boundaries, the existing 12-inch water main at the northwest corner of the Creekside Village Apartments will be required to be extended to the west as part of the development to provide sufficient fire protection. The number and locations of hydrants shall be coordinated with the City Fire Department.
72. Per City Standard 8.6.1.1, fire hydrants shall be installed at interval not to exceed 300 feet or as required by the City Fire Chief.
73. Include fire hydrant locations along Sequelitchew Drive.
74. Include the length, type, and size of pipe to the fire hydrant runs. Add identifying numbers to the fire hydrants (i.e. FH#1, FH#2, etc.).
75. Clearances, in accordance with City standards, will be reviewed for compliance during construction review. A minimum 3-foot clearance and level area is required around fire hydrants.
76. The alignment of the sewer line along the proposed Sequelitchew Road right-of-way shall be 5-feet south or west of the centerline of the right-of-way.
77. The sewer line at the north end of the proposed Sequelitchew Road right-of-way should end with a sanitary sewer manhole with a stub for future connection.
78. The plans shall demonstrate compliance with the underlying Short Plat No. PLNG2020-017. Sanitary Sewer Notes No. 2 requires each lot to be served by an individual side sewer stub unless otherwise approved by Pierce County. A sewer stub shall be provided to Lot 3.
79. Sheet C6 shows stormwater conveyance from the Sequelitchew Road right-of-way (Lot 2) and the site (Lot 1) to a proposed infiltration pond with a Stormwater Biofiltration System. Storm facilities intended to treat and detain runoff from public rights-of-way shall be placed in a separate tract identified as "Public Storm Facility" and the tract dedicated to City. The right-of-way stormwater facility will require a driveway approach with asphalt access road, 6-foot high fence, and a double posted access gate.



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80. Subgrade shall be firm and unyielding native material or structural fill. Add a note to this effect and the compaction percent to the pavement section details on Sheet C11. The recommendations from the geotechnical report should be added to the pavement section details for both onsite and Sequalitchew Road.
81. Add all City Standard Details, applicable to this project, to the plans.

PRELIMINARY TREE RETENTION PLANS

82. The composite utility sheet should be shown on the plans to identify any potential conflicts.
83. An existing tree to be retained (13" F) appears to be in conflict with the proposed walkway from the site to Sequalitchew Road.

PRELIMINARY LANDSCAPE AND IRRIGATION PLANS

84. The plans shall demonstrate compliance with the Street Tree requirements of DMC 25.90.030(1).
85. Trees should be located outside of the 15-foot wide water easement.
86. The proposed trees along Sequalitchew Road shall comply with City Street Tree Standards Detail (Drawing No. 5.7-1) and Street Tree Planting and Staking Detail (Drawing No. 5.7-2).
87. Per City Standard 5.7.5, all tree plantings shall include the installation of an approved root barrier adjacent to walks and curbs for each tree.
88. Street tree species shall be selected from the City's most current recommended street tree list. The City should review the tree schedule on Sheet L6 for acceptance.
89. The proposed street trees will most likely require watering for establishment. Identify how this will be accomplished.

TREE PROTECTION PLAN

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



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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 Sharabi, P.E., City Engineer, City of DuPont
Mr. Ray Shipman, Building Official, City of DuPont
Mr. Scott Hein, Public Works Supervisor, City of DuPont
Mr. Mike Turner, Fire Marshal, City of DuPont

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Traffic & Transportation Engineering Services

MEMORANDUM

August 15, 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

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 July 27, 2023. This is an update to the TIA's previously reviewed in March 2018 and February 2018. Furthermore, the comments contained in this memorandum supersede my comments dated August 7, 2023 for the review of the November 2022 TIA.

The July 2023 traffic study reviews the development of a single warehouse building totaling 243,180 square feet, which is smaller than the prior proposals. 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 423 new daily trips, with 53 new trips generated during the AM peak hour and 56 new trips during the PM peak hour. (*This is slightly less than the trips noted in my August 7th 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. The July 27th 2023 analysis updates previously submitted information associated with the new site plan and conforms to the City's guidelines and includes all the necessary information to complete my review, including items previously omitted in 2017. 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 my August 7th review 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. The minor typographical errors for the seconds of delay that were previously noted had been corrected in this TIA.
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 my August 7th review, 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.)*
4. Page 11, Section 4.3 – the future volume forecasts included both a 2% annual growth rate plus the pipeline trips. As noted earlier, 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.
 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 7th 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 and are slightly higher than those from the 2022 analysis due to the extended horizon year.
 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 slightly higher than those from the 2022 analysis due to a later project completion date used in the update.)*
 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 additional 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.